



ANNUAL REPORT

20

24

TABLE OF CONTENTS

1	About SPP	3	10.5	ESRS E2 Pollution	56
2	Foreword	3	10.6	ESRS E3 Water and marine resources	59
3	Corporate Governance System and Responsible Business	5	10.7	ESRS E4 Biodiversity and ecosystems	61
4	Financial Information and Risk Management	6	10.8	ESRS E5 Resource use and circular economy	63
5	Electricity and Gas Supply in 2024	11	10.9	ESRS S1 Own workforce	66
6	Products, Services, and Projects in the Interest of Business Sustainability	13	10.10	ESRS S3 Affected communities	74
7	People in SPP	14	10.11	ESRS S4 Consumers and end-users	76
8	Social Responsibility	15	10.12	ESRS G1 Business conduct	79
9	Financial Statements	18	11	List of abbreviations	82
10	Consolidated Sustainability Statement	19	Annex 1 – Independent Auditor’s Report and Individual Financial Statements for 2024		83
10.1	Independent Auditor’s Limited Assurance Report on Consolidated Sustainability Statement	19	Annex 2 – Independent Auditor’s Report and Consolidated Financial Statements for 2024		85
10.2	ESRS 2 General Disclosures	23	12	Contacts	87
10.3	EU Taxonomy compliant reporting of sustainable investments	41			
10.4	ESRS E1 Climate Change	48			

1 ABOUT SPP

We build on over 165 years of tradition of operating in the energy sector and we are now the largest energy supplier in Slovakia. We guarantee the reliable, secure and competitive supply of gas and electricity, together with related services, to about 1.5 million points of supply across all market segments and regions in Slovakia. In addition to supplying energy, SPP also offers a wide range of energy services and other complementary services.

Given our history, supplying gas is at the core of our business. We are aware that in the interest of sustainability it is necessary to lower the consumption of all fossil fuels, including natural gas. Therefore, we focus new investments in our business on energy efficiency services and the development of energy production from renewable sources.

SPP is a joint stock company. The sole shareholder of SPP is the Slovak Republic, exercising shareholder rights through the Ministry of Economy of the Slovak Republic. The Board of Directors is the statutory body of SPP, managing the company's activities and making decisions on all matters, excepting those under the purview of the General Meeting or Supervisory Board by way of legal regulations

or the Articles of Association. The Supervisory Board is the supreme control body of SPP, supervising the powers exercised by the Board of Directors and the business activities pursued by the company. One third of the Supervisory Board, i.e. three members, is elected by SPP employees.

SPP also pursues its business activities through subsidiaries, either wholly-owned by SPP or owned jointly with other partners. SPP implements its activities in the field of corporate responsibility and philanthropy through the SPP Foundation and EkoFond SPP.

At SPP, we strive for communication that is gender balanced. However, for the sake of easier comprehension, not all chapters contain text written in a gender-neutral language. All references to persons of masculine gender in this Consolidated Annual Report of SPP (hereinafter the "Annual Report") also refer to persons of feminine gender.

2 FOREWORD

DEAR LADIES AND GENTLEMEN,

The situation in supplying natural gas to Slovakia changed dramatically on 1 January 2025. After more than fifty years, gas stopped flowing in the usual east-west direction. The reason was the expiry of the gas transmission contract through the territory of Ukraine between the Ukrainian company Naftogaz and the Russian company Gazprom Export, as well as the rejection of all solutions offered to preserve this transmission. SPP has long been preparing itself for this situation throughout 2024, which is why the company continues to guarantee secure natural gas supplies to all its customers, from large industrial businesses to households.

In terms of the security of supply, thanks to the combination of diversification contracts, secured transmission routes, and gas available in storage facilities, we have at our disposal the largest quantity of gas seen in recent years. The security of natural gas supplies from SPP stands on three main pillars. The first pillar is the diversification commercial contracts for the purchase of gas from non-Russian sources concluded with BP, ExxonMobil, Shell, ENI, and RWE. The second pillar of gas supply security is diversified transmission routes. Slovakia has gas

interconnectors with all neighbouring countries. This means that natural gas can be transported in any direction. The third pillar of supply security for our customers is natural gas stored in storage facilities. At the start of 2025, we had 70% more gas in them than in the previous winter season.

We have long supported the continuation of gas transmission through the territory of Ukraine as we consider it the most advantageous solution for our customers. In an effort to maintain this transmission route, we conducted active negotiations in the course of 2024 with all our trading partners, including Ukraine's Naftogaz and Russia's Gazprom. We offered multiple options to our partners, including the alternative of becoming a transmission agent either for the entire amount of gas transported in 2024 or a portion of it only for the needs of SPP.

In cooperation with other partners, we also prepared the Declaration of Support for Gas Transmission through the Territory of Ukraine. The signatories of this declaration included major energy suppliers and transmission companies, important trade associations, as well as large industrial customers from Hungary, Austria, Italy and Slovakia. We submitted this

declaration to the President of the European Commission, Ursula von der Leyen, to provide her with first-hand information about the threat to energy and economic security in our region.

Diversification comes at a price – if Russian gas does not flow to our territory in 2025 at all and SPP purchases the entire required amount for its customers from some other source and physically transports it to Slovakia, this will cost approximately €90 million extra. The difference is mainly in the transmission fees. However, other consequences must be considered, as well. The disruption of gas supplies to the EU after the termination of natural gas transmission through Ukraine raises, directly or indirectly, prices on wholesale markets and heightens the sensitivity of gas prices to any news hinting a threat to infrastructure or production shutdown.

In 2024, we succeeded in stabilising our overall market share in gas supplies at about 63%. We thus confirmed our position as a responsible and reliable leader in the energy supply market. We supplied nearly 31 TWh of gas and 7.7 TWh of electricity to end consumers and others. We supplied electricity to more than 300 000 points of supply and our market share in electricity supply to households reached 12%. Since the opening up of the energy market, most customers have chosen SPP as their new electricity supplier from all other suppliers. In addition, more than 5 TWh of gas was supplied to customers by SPP CZ in the Czech Republic.

In electricity generation, in 2024 we continued with our projects for building photovoltaic power plants at schools. By the end of the year, we had finished projects at 20 schools, allowing them to enjoy significant savings in electricity costs. Our subsidiary company ESCO Slovensko continued to implement photovoltaic power plants for large customers and we launched our own solar electricity production project at the SPP site in Michalovce. We are also continuing to develop intensively wind power plant projects in several locations in Slovakia, as well as the production of biomethane from waste. The pursuit of sustainability represents an important part of our business. To achieve it, we adopted the SPP Sustainability Strategy 2050 in 2024 and tweaked the settings of our internal processes. This is the first time that we report on sustainability and the impacts of our business directly in the Annual Report.

The operating profit of SPP reached €156 million in 2024 and the total profit after tax came to €279 million. With its financial results, SPP demonstrates that it successfully continues in its transformation into an energy player capable of sustainably competing on the Slovak and European markets and, at the same time, fulfilling the strategic energy tasks of the state. The basis of this success is the company's professional human potential and continued adaptation to new market conditions. By combining the above activities, SPP secures a stable income for the state budget in the form of dividends.

In 2024, we were once again a proud partner of the Slovak Paralympic Team that represented our country at the Summer Paralympic Games in the French capital of Paris. The unbreakable will to win, the energy, talent, and determination translated into 5 medals for our athletes, also thanks to our long-term support. Our position as an energy market leader obliges us to develop public-beneficial and philanthropic activities. We supported hundreds of projects in various social fields through the activities of the SPP Foundation and EkoFond SPP.

We consider responsible business practices to be a key factor of long-term success. Therefore, I am pleased that the settings of our corporate governance system and the principles of responsible business in our company were recognised in 2024 by the Office for Standardisation, Metrology, and Testing of the Slovak Republic as the organiser of the National Award of the Slovak Republic for Quality and Social Responsibility. Thanks to our activities and the exceptional efforts of our colleagues, SPP won the 22nd annual competition in the Social Responsibility category.

I would like to thank our customers, business partners and, of course, all our colleagues, for their trust and cooperation in the past year. I believe that through joint effort we will be able to overcome the challenges brought to us by 2025.

doc. Ing. Vojtech Ferencz, PhD., MBA
Chairman of the Board of Directors and CEO

3 CORPORATE GOVERNANCE SYSTEM AND RESPONSIBLE BUSINESS

SPP is a process-managed company that has an implemented comprehensive management system (corporate governance) as a prerequisite for conducting business in a responsible manner. This covers ethical principles, core values, and rules defined in the SPP Compliance Program and other parts of SPP's internal documentation, which are binding on all members of the statutory and supervisory bodies, the management, employees and contractual partners of SPP.

The SPP Compliance Program consists of the SPP Code of Conduct, which expresses our attitudes and the standards of conduct required of our employees and contractual partners, the Compliance Program Directive, the Directive on Reviewing Notifications and Complaints Regarding Anti-Social Activities and Violations of the Rules and Principles of Responsible Conduct, the Compliance Manager Statute, and other Compliance Manager tools. Internal rules also cover the field of combating money laundering.

Likewise, SPP adheres to the Code of Corporate Governance for State-Owned Companies in Slovakia, including regular audits of compliance with the corporate governance system; we also adopted the SPP Code of Conduct, expressing

our attitudes and the standards of conduct required of our employees and contractual partners.

SPP has created procedures and measures to protect the company against internal and external risks through a three-tier internal control system:

- (i) system of control mechanisms (measures) introduced at the level of organisational units and serving to mitigate risks present in various processes and activities,
- (ii) components of our internal control system that include risk management, personal data protection, security, and security policy (information and cyber security, physical and facility security, occupational health and safety (OHS)), fire protection (FP), environmental protection, fraud protection, protection against money laundering and other illegal activities, business continuity management (BCM), corporate governance, and the Compliance Program,
- (iii) internal auditing, which provides the senior management, the Board of Directors, and the Supervisory Board with independent reassurances as to what extent the functioning of the control system at the

first and second level complies with the requirements of the Board of Directors and senior management.

As the largest energy supplier in Slovakia and a company that is wholly state-owned, SPP adheres to the Slovak Republic's commitment to achieving carbon neutrality by 2050. We consider climate and environmental protection goals to be achievable only by reducing consumption, especially of all fossil fuels, including gas, and by the consistent application of measures to improve energy efficiency and the development of energy production from renewable sources.

The company has adopted the SPP Sustainability Strategy 2050 in order to align our business and our product and service offer with the goal of achieving sustainability and reducing the negative impacts of our activities.

At the same time and in the interest of effective impact management, the process of adopting and updating the SPP Sustainability Strategy 2050 and targets for achieving sustainability, as well as to supervise the implementation of the targets set out in the SPP Sustainability Strategy 2050 and assessment of sustainability risks, the SPP Board of Directors adopted a comprehensive Sustainability Management Programme in 2024.

The setting of the company's corporate governance system and the principles of responsible business in SPP was recognised in 2024 by the Office for Standardisation, Metrology, and Testing of the Slovak Republic

as the coordinator of the state quality policy and the organiser of the National Award of the Slovak Republic for Quality and Social Responsibility competition.

The National Award is a prize given to organisations that achieve excellent results in the fields of quality and social responsibility. It is intended to support the development and improvement of quality in companies, public administration bodies, and other organisations, while also reflecting their responsible approach to the environment, social responsibility, and ethical standards. The awarded organisations often serve as models for other businesses and institutions in the country.

SPP became the winner of the 22nd annual competition in the Social Responsibility category and an awarded finalist in the Quality category.

More information on our corporate governance setup, including SPP's sustainability management and strategy, is found in the sustainability reporting section.

4 FINANCIAL INFORMATION AND RISK MANAGEMENT

ECONOMIC AND FINANCIAL PERFORMANCE

In 2024, SPP's **revenues from customer contracts** totalled €2768 million, representing a decline by €1156 million year-on-year. Revenues were negatively influenced by a drop in natural gas sales by €1095 million and lower electricity sales by €61 million. This was a result of falling energy prices in the markets, which we reflected in lower commodity prices both for gas and electricity. Revenues from natural gas sales on the domestic market were influenced by lower prices for large customers, a lower volume of natural gas sold in the retail and household segments, as well as by declining prices for these customer groups.

Extraordinary measures were applied to adjust electricity and gas supply prices for vulnerable customers in the form of price caps via so-called crisis management or obligations in the general economic interest. In addition to direct revenues from gas supply contracts, the 2024 revenues were also positively affected by implemented compensations for natural gas within the framework of so-called crisis regulation (i.e. by a special capping of gas prices at a lower than market level by the Slovak

Government). However, the compensations for natural gas for households were significantly lower year-on-year, which was related to the positive development of gas prices in the markets – i.e. by lower gas purchasing costs and a lower amount of natural gas sold in this segment.

Key items in operating expenses comprised gas purchase costs, electricity purchase costs, and gas storage costs. SPP's lower gas purchase costs in 2024 over the previous year related to gas prices in the commodity markets. Lower year-on-year gas purchase costs of SPP were positively influenced in 2024 by the higher amount of gas purchased from Gazprom Export at an average purchase price lower than in 2023. Gas storage and transmission costs were a major factor linked to the diversification of sources and maximisation of gas reserves.

On the one hand, SPP managed in 2024 to appropriately exploit market opportunities and stabilise its market share in all segments within a complicated environment while maintaining competitive pricing and profitability. On the other hand, SPP achieved significant optimisation of sourcing costs by constantly improving its resource management strategy

in the form of optimal utilisation of storage facilities, transmission capacities, concluded bilateral contracts, and by maintaining a conservative risk policy. The said activities, along with active cash flow management, contributed to a higher financial result for SPP. In 2024, SPP reported a positive operating income of €156 million.

Profit from financial operations before tax reached €195 million in 2024, thanks to dividends paid out by the company SPP Infrastructure, a. s. and the positive impact of interest income. Profit before tax was €351 million. Total income tax liability reached €72 million, of which a special levy comprised €14 million. Profit after tax amounted to €279 million.

Comparison of financial results (in € million)	2024	2023
Revenues from customer contracts	2768	3924
Profit before tax	351	321
Income tax	(72)	(31)
Profit after tax	279	290

CAPITAL STRUCTURE

Total assets of SPP fell to €4,238 million as at the balance sheet date. They were down EUR 383 million against the previous period (index of 0.92). Non-current assets amounted to €2,197 million. Among key items in non-current assets were long-term financial investments and real-estate investments, followed by buildings and structures (including unfinished capital construction), other non-current assets.

Non-current assets comprised 51.8% of total assets. They fell by €97 million against the previous year. The item 'Buildings, structures, machinery and equipment, intangible non-current assets and real-estate investments' saw a minimal decline of €5 million. Other non-current assets dropped by €44 million against the previous period due to a decline in non-current receivables from financial derivatives. Long-term financial investments stayed at the level of 2023, with the deferred tax asset at zero in 2024 and turning into a deferred tax liability.

Capital expenditures came to EUR 4 million in 2024. SPP mostly invested in technical, commercial, and IT communication systems, as well as in the reconstruction of SPP's office buildings and facilities. SPP has no costs for research and development activities to report.

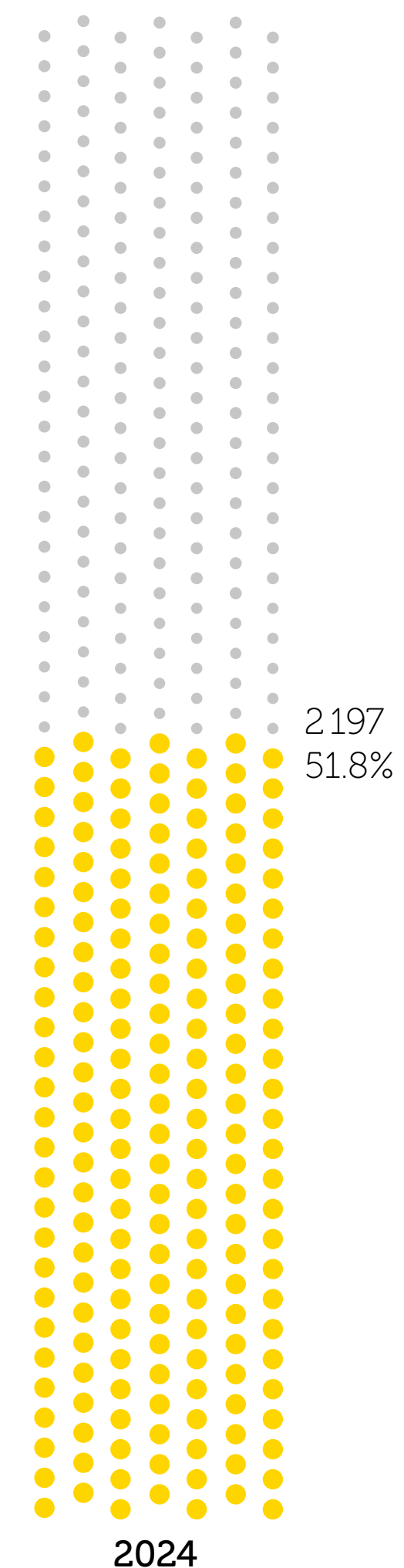
As of the balance sheet date, current assets consisted of receivables, inventories, and cash. Their total volume reached €2,041 million, accounting for 48.2% of total assets. They fell by €286 million against the previous year. This substantial decrease in current assets was caused, among other things, by falling receivables, particularly receivables from financial derivatives, and falling other receivables from foreign collateral. At the end of the year, receivables from natural gas sales from separate gas trades rose year-on-year.

Shareholders' equity amounted to €3,028 million in 2024, representing 71.4% of SPP's total capital. In addition to share capital, it included the statutory reserve fund, other funds, provision from hedging derivatives, retained earnings, and income of the current period. Shareholders' equity in SPP rose by €34 million year-on-year. The provision from hedging derivatives went up while other funds declined.

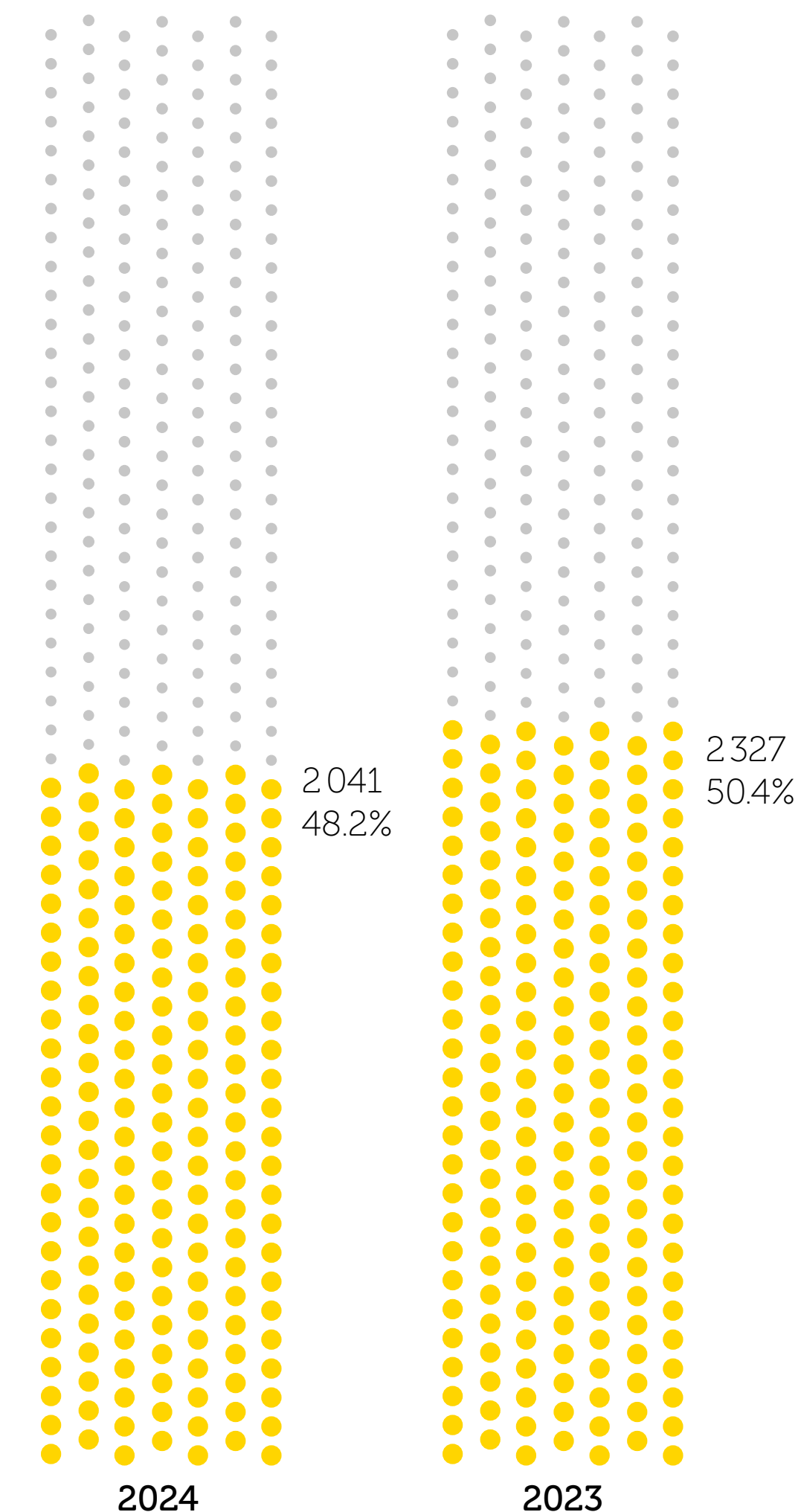
SPP's **share capital** represented the capital registered in the Commercial Register, comprising €885 million. This includes 26,666,536 ordinary shares with a par value of EUR 33.19.

Assets structure comparison (in € million)

Non-current assets

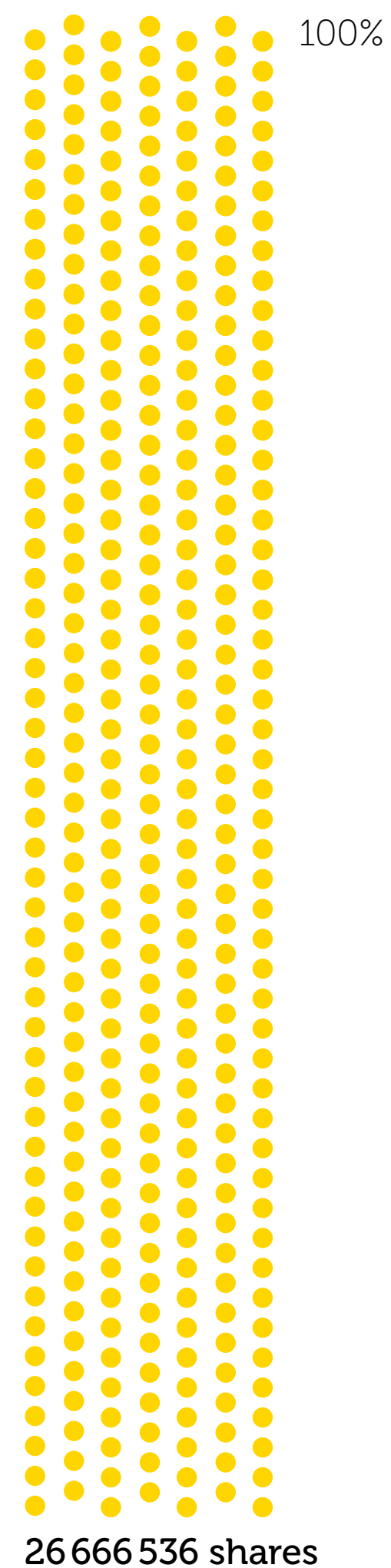


Current assets

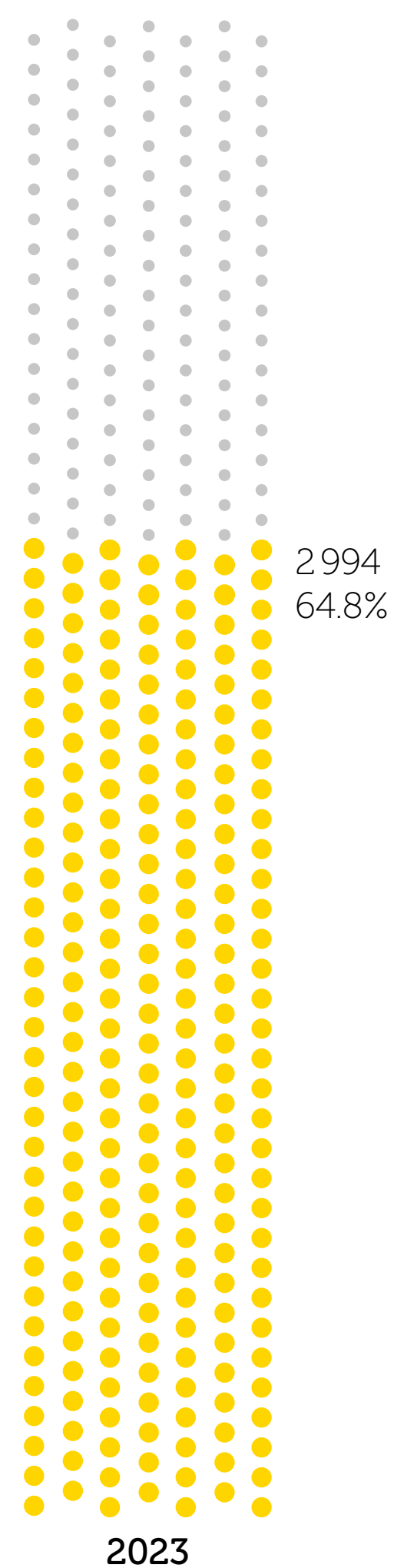
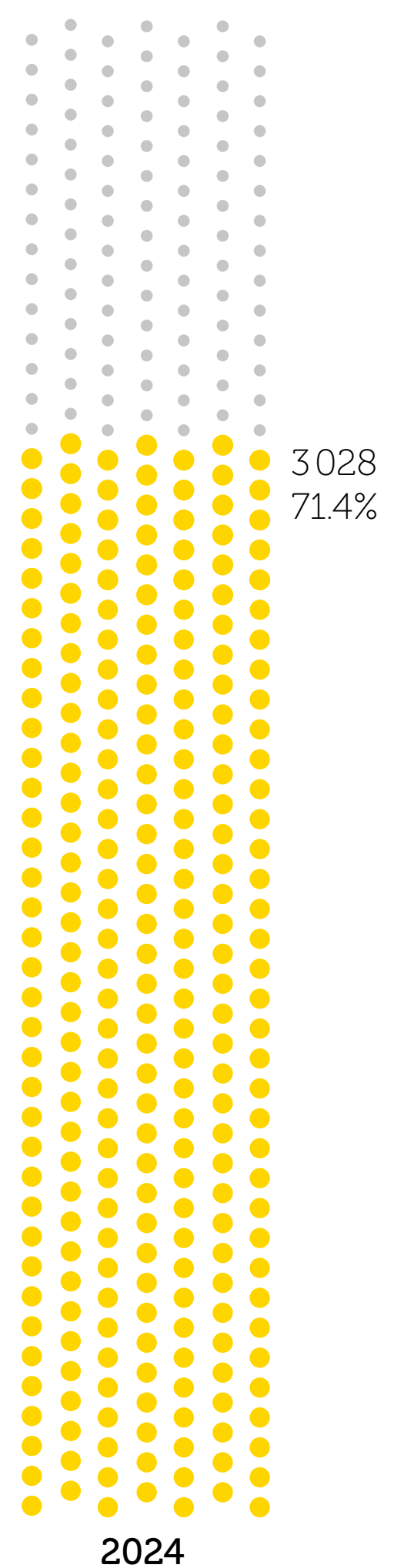


SPP Shareholder Structure as of 31 December 2024 Comparison of total capital structure (in € million)

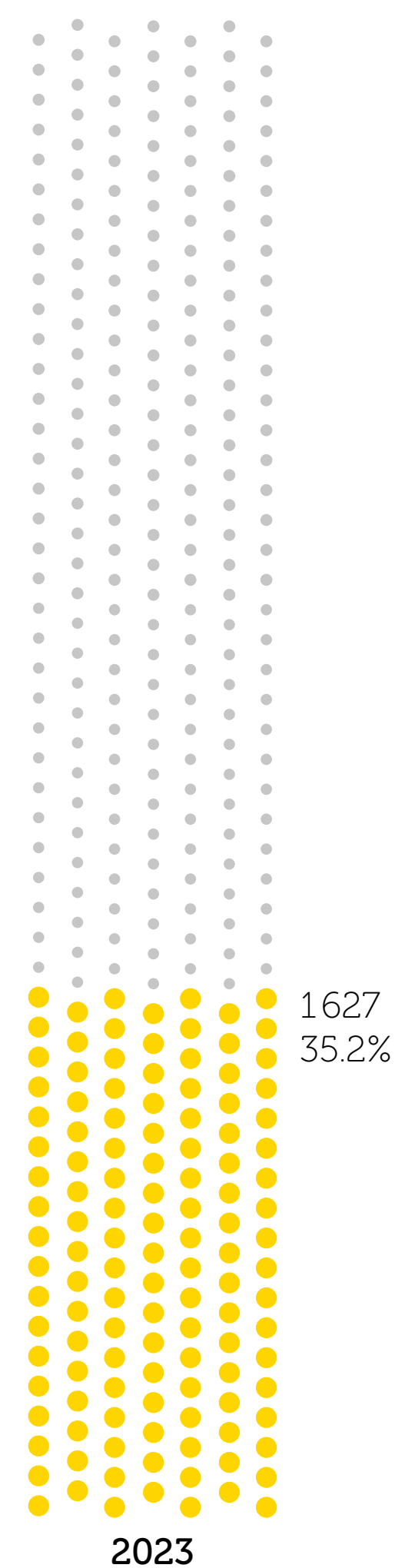
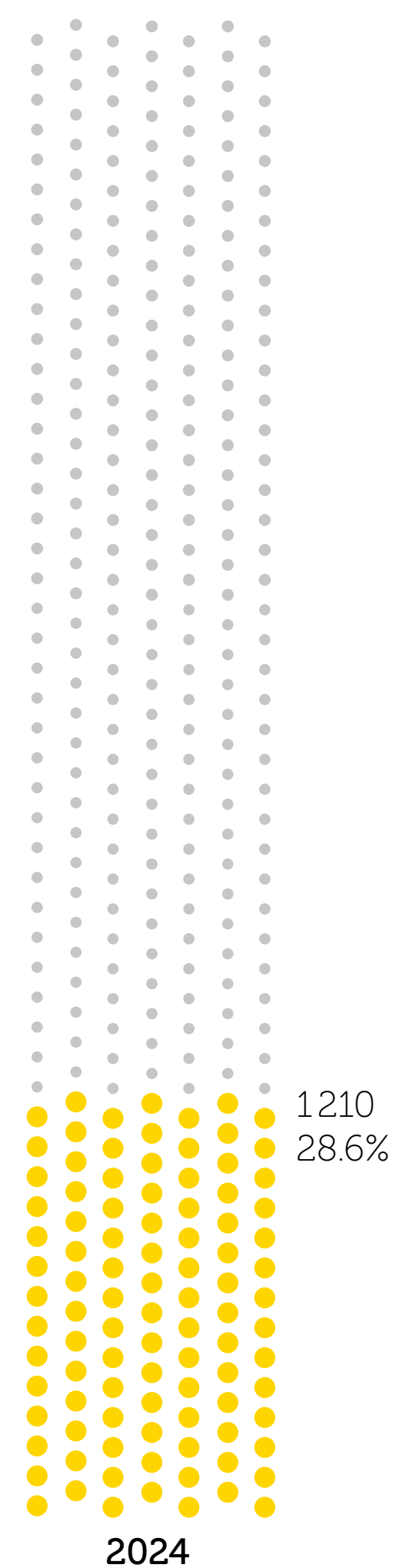
Ministry of Economy of the Slovak Republic



Equity



Liabilities

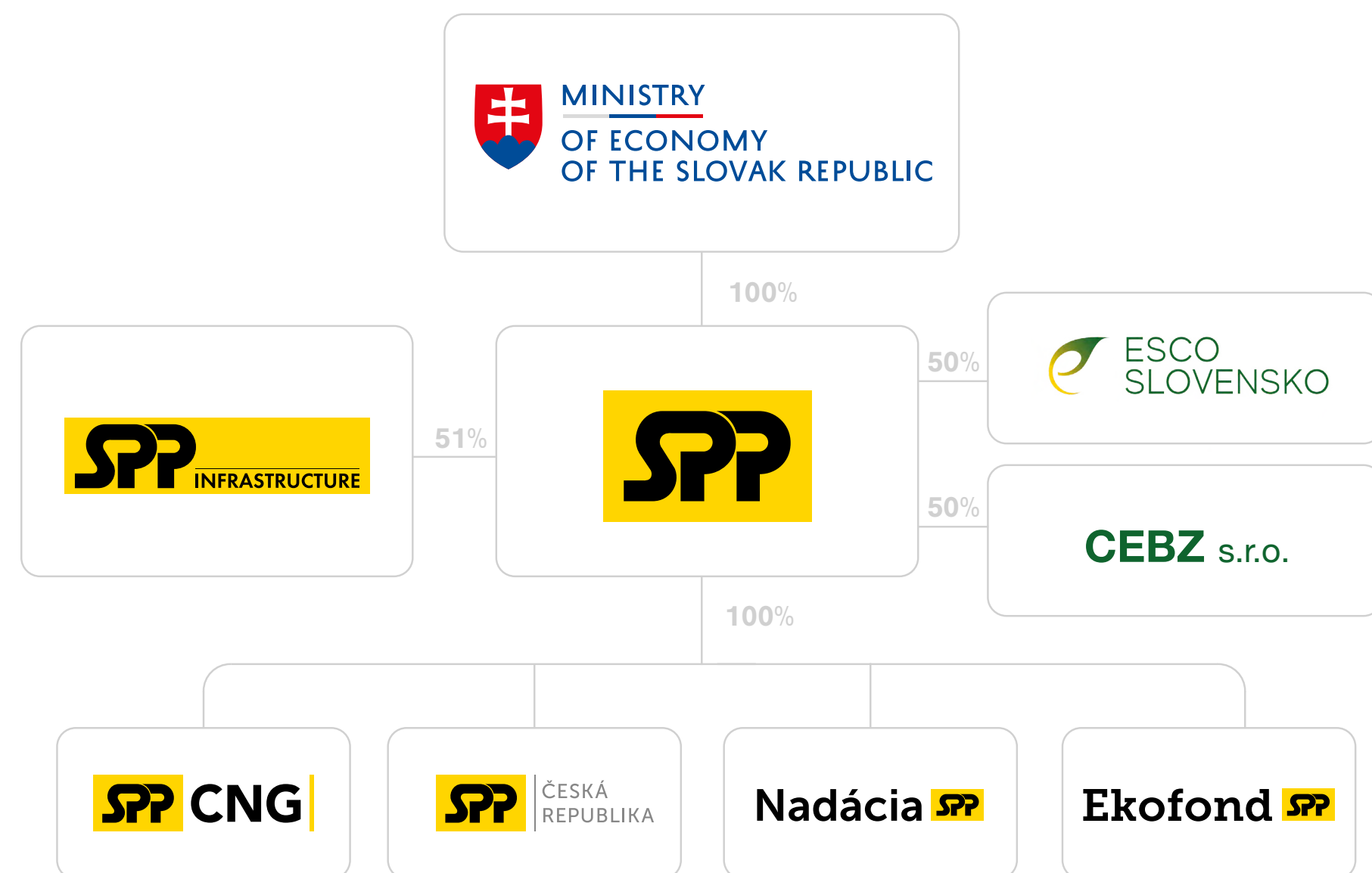


The **balance of SPP's statutory reserve fund** stood at €1198 million as of 31 December 2024.

In 2024, **liabilities** totalled €1210 million, down €417 million against the initial balance. Total liabilities comprised non-current liabilities of €103 million and current liabilities of €1107 million. The year-on-year change was due to lower non-current and current liabilities as a result of declining financial derivate liabilities and short-term loans of SPP. On the other hand, we saw a significant increase in natural gas purchase liabilities, which was a result of large amounts of gas purchased at the end of 2024 and the current situation in the gas market following the end of gas transmission through Ukraine.

EQUITY HOLDINGS

Subsidiaries, joint ventures, and affiliated companies



SPP operates an organisational unit in the Czech Republic.

RISK MANAGEMENT

The changes in the European energy market triggered by the energy crisis have accelerated major transformation of SPP's resource management strategies, having an impact on risk management processes. The pressure to change established practices mostly resulted from the need to respond to higher costs for storage capacities and transmission capacities associated with the diversification of gas sources and the security of supply.

In 2024, SPP was preparing itself for the possible termination of gas supplies from the Russian Federation, aiming to balance its preparedness for a change in sourcing and economic costs. It was also necessary to reflect on new market opportunities in the form of higher volatility, the development of prices on individual exchanges and products, as well as on the resulting development of trade margins and contractual terms for end customers.

In this environment, SPP fully utilised its professional capital and existing resources in the form of access to energy exchanges, global gas markets, storage capacities, concluded bilateral contracts with major global traders and banks, as well as its reputation as a strong and stable company for the purposes of significantly reworking its sourcing and hedging strategy. This adapting approach then enabled SPP to further optimise sourcing costs while maintaining competitive prices and above-standard requirements for security of supply.

Using its resources and know-how, along with adjusting the implemented hedging strategies and additional operations implemented to hedge price and other risks, SPP optimised its sourcing costs so that they not only compensated for higher storage and transmission costs, but also resulted in a sustainable positive operating result.

The optimisation of cash flow management, which allowed SPP to implement the discussed operations without limitations while maintaining an acceptable level of credit burden and the resulting minimal negative impact on the economic result, was an important pillar in the environment of volatile gas prices in commodity markets.

While implementing these changes, SPP relied on its functional conservative risk management strategy aimed at minimising market and other risks, thanks to which SPP coped with required changes without impacts on the financial results or stability of the company.

The adopted risk management strategy centring on ensuring financial and operating stability thus remains one of the pillars for achieving SPP's business and development goals also with respect to the challenges of 2025.

When conducting its business activities, SPP relies on a stable and functional risk management system. It incorporates a corresponding organisational structure with clearly defined lines of responsibility, as well as effective procedures for risk identification, analysis, evaluation, handling, monitoring,

review, recording, and reporting. These procedures make it possible to eliminate financial losses or other negative consequences of the potential materialisation of risks so that they do not significantly affect SPP's capacity to conduct its business activities and provide services to customers.

SPP's risk management system addresses all known risks, to which the company is or may be exposed. Its implementation falls to the independent Risk Management Department.

In managing its risks, SPP mostly focused on the following in 2024:

- a) market risks that manifested in 2024 in the form of risks associated with volumes and prices in commodity purchases/sales and gas storage facility management, and this mainly due to uncertainties in commodity volumes off-taken by end consumers as a result of temperature risk, and in the pricing field in the form of a significant year-on-year change in market prices coupled with strong volatility. In 2024, SPP continued in its strategy to minimise open positions by implementing a conservative hedging policy and by managing limited open positions in the portfolio within set limits;
- b) credit risks relating to the potential inability or unwillingness of business partners to timely meet their contractual obligations towards SPP. SPP manages this risk using its internal credit risk assessment process and by setting the payment and price conditions for defined counterparties and segments with the aim of minimising both credit and potential market risks. Where necessary,

and in order to hedge against excess credit risk, SPP uses third-party guarantees, bank guarantees, and the mutual offsetting of receivables;

- c) liquidity risks pertaining to the potential default of SPP in meeting the company's liabilities towards third parties. SPP manages this risk by continuously monitoring the liquidity situation, including the application of stress tests with subsequent management of credit lines, existing contractual relations, and other;
- d) operating risks arising from deficiencies in the setting of internal processes, information systems, from possible human error, or from the occurrence of adverse phenomena in the external environment impacting the internal processes;
- e) other risks, in particular strategic, regulatory, and legal risks.

SPP also adopted the Sustainability Management Programme in 2024. In line with this, SPP prepared a general register of sustainability risks that shall be subject to regular assessment, including risks related to the fulfilment of the SPP Sustainability Strategy 2050 and the targets set in it.

The conservative risk management strategy is being continuously developed and improved, comprising a basic prerequisite for the continuance of SPP's adaptable resource management strategy so that it is possible to sustainably achieve the chosen financial and strategic goals of the company.

POST BALANCE SHEET EVENTS

No events occurred after 31 December 2024 that would have a significant impact on the individual financial statements of SPP.

The supplies of natural gas from Gazprom Export LLC, taking place under a long-term purchase contract, were suspended as of 1 January 2025. Starting 1 February 2025, short-term deliveries were agreed from Gazprom Export LLC via an alternative transport route and at partial quantity. Presently, negotiations are underway regarding deliveries for future periods.

5 ELECTRICITY AND GAS SUPPLY IN 2024

SPP – THE LEADER IN ENERGY SUPPLIES

In 2024, SPP once again confirmed its position as a responsible and reliable energy market leader in Slovakia, with about 1.5 million points of supply. SPP also continued to diversify and optimise the sourcing of natural gas supplies in 2024, meaning it was capable of guaranteeing the security and continuity of gas supplies to all company customers, from households to large industrial consumers.

In the past year, SPP supplied 30.9 TWh of gas to end gas customers and other gas suppliers in Slovakia (of which 30.2 TWh comprised gas supply to end customers). SPP's total market share amounted to about 63%.

SPP supplied 7.7 TWh of electricity to end electricity customers or other electricity suppliers in Slovakia (of which 1.9 TWh comprised electricity supply to end customers; 5.5 TWh comprised electricity supply to other electricity suppliers for households, of which most came from Slovenské elektrárne, a.s. as part of extraordinary government measures aimed at mitigating the impact of high

electricity prices on households, while 0.4 TWh comprised supply to other electricity suppliers).

The share of SPP in the household electricity segment came to about 12%. With this result, SPP confirmed its stable position among the TOP 4 electricity suppliers. Since the opening up of the energy market, most customers have chosen SPP as their new electricity supplier from all other suppliers. At the end of last year, SPP supplied electricity to more than 300 000 points of supply.

Our subsidiary operating in the Czech Republic – SPP CZ, a.s., supplied approximately 5.1 TWh of gas and 0.3 TWh of electricity to its customers in 2024. By doing so, it confirmed its position among respected and stable energy suppliers in all segments, including traders, large industrial companies, customers in the small businesses and organisations segment, as well as in households. Within the retail segment, SPP CZ supplies gas or electricity to almost 20 000 points of supply.

DEVELOPMENTS IN THE GAS AND ELECTRICITY MARKET

After two years of decline, total gas and electricity consumption in Slovakia rose again year-on-year in 2024. This was mainly due to growing consumption by large corporate customers. On the other hand, the consumption by households continued to fall. This development was due to higher-than-average temperatures and ongoing efforts among customers to achieve energy cost savings.

In the corporate sector, economic recovery supported by subdued inflation prevailed both in the Slovak Republic and among foreign partners. After record levels seen in 2022, wholesale gas and electricity prices gradually declined on the market and experienced a relatively less volatile development in 2024. The European gas market was well supplied as the demand in the power and other sectors was balanced on the supply side by the diversification of sources, mainly through massive imports of liquified natural gas (LNG) to the continent and above-standard utilisation of underground storage facilities.

The utilisation rate of European underground storage facilities ahead of the 2023/2024 heating season was above-standard at almost 100%. We succeeded well in advance in achieving the established target to have storage facilities filled to 90% as of 1 November 2023. The improvement of energy efficiency and a reduction of gas consumption remain key measures pursued by the European Union (EU). In the first quarter of 2024, the prices of other

energy commodities and emission allowances fell as well, having a positive impact on electricity prices. Shortly after that, the market turned around and commodity prices rose. The price of electricity stabilised at around 100 €/MWh for the rest of the year. We may conclude that 2024 was less volatile than previous periods, bringing more stability to the market.

At the end of 2024, wholesale gas prices began to increase significantly due to the expiry of the contract for transmission of Russian gas through Ukraine. The significant price hikes, caused by the final closure of gas transmission through Ukraine at the end of the year, manifested in the first weeks of 2025.

DIVERSIFICATION AND SECURITY OF GAS SUPPLIES

SPP's long-term priority is to guarantee secure gas supplies to all customers, from large industrial businesses to households. That was also why SPP continued its activities in 2024 aimed at preparing the company for the possible termination of gas supplies via Ukraine. In terms of security of supply, thanks to our combination of diversification contracts, secured transmission routes, and gas available in storage facilities, at the end of 2024 SPP had the largest available volume of gas seen in recent years.

The security of natural gas supplies from SPP stood on three main pillars. The first pillar is the diversification commercial contracts for the purchase of gas from non-Russian sources

concluded with BP, ExxonMobil, Shell, ENI, and RWE. The second pillar of gas supply security is diversified transmission routes. Slovakia has gas interconnectors with all neighbouring countries. This means that natural gas can be transported in any direction. The third pillar of SPP's security of supply for its customers is natural gas stored in storage facilities. At the end of 2024, SPP had 70% more gas available in them than in the previous winter season.

SPP has long supported the continuation of gas transmission through the territory of Ukraine as it considers it the most advantageous solution for our customers. In an effort to maintain this transmission route, SPP held active negotiations throughout 2024 with all of our trading partners, including Ukraine's Naftogaz and Russia's Gazprom. SPP offered multiple options to its partners, including the alternative of becoming a transmission agent either for the entire amount of gas previously transported (about 14 billion m³) or a portion of it only for the needs of SPP.

In cooperation with other partners, SPP also prepared the Declaration of Support for Gas Transmission through the Territory of Ukraine. The signatories of this declaration included major energy suppliers and transmission companies, important trade associations, as well as large industrial customers from Hungary, Austria, Italy and Slovakia. SPP submitted this declaration to the President of the European Commission, Ursula von der Leyen, to provide her with first-hand information about the threat to the energy and economic security of our region.

PUTTING THE CUSTOMER FIRST – SPP'S PRIORITY

For SPP, 2024 was a period of extensive improvements in the customer experience and the strengthening of customer relationships. In the course of the year, multiple communication campaigns were carried out, focusing on an advantageous combination of two types of energy under one roof, the digitalisation of services, and the achievement of business goals. Support was provided throughout the year for registrations to the customer zone and the My SPP mobile app, which allows customers to manage their energy efficiently.

Attention was also paid to the modernisation of payment processes, the transition from paper invoices to eInvoices, a welcome benefit when switching electricity to SPP, gas retention campaigns, and the extension of offered auxiliary non-commodity services. The new Virtual Battery from SPP service has become another important part of our marketing communication.

Last year's main campaign was the TV commercial Two Energies Under One Roof, followed by our Christmas campaign called Energy That Connects. The number of registered customers at My SPP portal has been constantly growing and exceeded 255 000 at the end of 2024.

The continued modernisation of SPP Customer Centres across Slovakia was an important part of improving the customer experience in 2024.

The branches in Michalovce, Humenné, and Komárno were modernised. The SPP Customer Centre in Žilina was moved to a shopping mall, thus significantly improving its accessibility and customer comfort. These changes produce not only modernised and streamlined premises, but also better personal communication with customers.

SPP's communication on social networks underwent significant changes as well. In 2024, SPP published videos and interactive content with the authentic presentation of SPP employees. It was they who became the faces behind the SPP brand and travelled throughout Slovakia with a "van full of energy" to get even closer to customers. This initiative was aimed at emphasising the fact that SPP is made up not only of professionals, but also people with humour and positive energy. SPP reaffirms that energy is not just about supplying gas and electricity, but also about creating values connecting people and shaping a better future.

CUSTOMER SERVICE AWARD

SPP's efforts in the field of customer service were recognised by the world-renowned company KMPG, which once again awarded SPP with the prize for "Best Customer Service in the Energy Sector". This success was defended for the second year in a row, confirming the high standard of services and the correct setting of our customer strategy.

PRICES AND REGULATION

The supply of gas to customers in the household segment and to other vulnerable customers meeting the legislative conditions for the application of regulated prices continued in 2024 to be subject to price regulation by the Regulatory Office for Network Industries (RONI).

Another subject to price regulation in 2024 by the Regulatory Office for Network Industries (RONI) was the supply of electricity to customers in the household segment and other vulnerable customers meeting the legislative conditions for application of regulated prices.

In reaction to the exceptional hike in electricity and gas prices, the Government of the Slovak Republic and the Ministry of Economy of the Slovak Republic adopted various measures aimed at lowering final prices for households and certain vulnerable customers below regulated prices, which would otherwise have reflected the extraordinarily high electricity and gas prices on the markets in 2022 and 2023, if it were not for government's measures adopted in 2024. The extraordinary measures greatly reduced the negative impact on vulnerable gas and electricity customers.

In 2024, SPP acted as a supplier of last resort in gas supply, in accordance with RONI's decision. Supplies of gas in this mode are subject to price regulation by RONI. SPP supplied gas in the last resort mode without any interruptions or restrictions.

6 PRODUCTS, SERVICES, AND PROJECTS IN THE INTEREST OF BUSINESS SUSTAINABILITY

Securing the stable and reliable supply of gas and electricity to all our customers remains a top priority for SPP. At the same time, the company is aware of its responsibility. Therefore, it develops its business with an emphasis on sustainability.

SPP's goal is to reduce the negative impacts of its business, including greenhouse gas emissions created in connection with SPP's activities. Their reduction requires a combination of measures aimed at improving energy efficiency and reducing energy consumption by increasing the share of gas supplied with guarantees of RES origin, electricity supplied with guarantees of RES and nuclear origin, and by developing our own electricity production from RES.

PRODUCTS AND SERVICES

In 2024, SPP continued to provide the SPP Carbon Footprint service aimed at motivating customers to lower energy consumption and support community-benefit activities, such as planting trees in protected areas in Slovakia. Together with its customers, SPP has planted more than 1.9 million new trees since 2020 as part of its SPP Carbon Footprint service.

SPP also continued to provide the Clean Electricity S from SPP service, through which it supplied guarantees of RES electricity produced in Slovakia, while customers regularly contributed to the construction of photovoltaic power plants (PVPP) at schools. In 2023 and 2024, SPP launched local PVPPs at 20 schools thanks to its customers, with a total output of 478 kWp.

The SPP Carbon Footprint and Clean Electricity from SPP services are used by more than one hundred thousand SPP customers.

EFFICIENT USE OF ENERGY

SPP provided energy efficiency improvement services in the form of guaranteed energy services or local PVPP sources to large customers with a total annual energy consumption of over 1000 MWh through its subsidiary ESCO Slovensko. The implemented projects produced annual CO₂ emission savings of almost 5 thousand tonnes in 2024. Also in 2024, ESCO Slovensko implemented for customers PVPPs with a total output of 3 MWp and developed another 3 MWp for implementation.

SPP operated a PVPP in Michalovce producing an output of 628 kWp in 2024. Along with smaller PVPPs on the roofs of buildings in Bratislava and Košice, SPP produced 476 MWh of RES electricity in 2024.

In 2024, SPP likewise completed the procurement of the contractor for the planned battery storage facility with a capacity of 4 MW, which should be located at the SPP site in Spišská Belá. We expect its implementation in 2025.

WIND POWER

SPP strives to be a key player in building and operating wind power plants in Slovakia and to contribute in this way to energy security, self-sufficiency, and an optimal energy mix in Slovakia. In 2024, SPP initiated the development of eight wind park projects with a planned output of more than 460 MW.

These projects are either at the final stage of the environmental impacts report, the stage of environmental studies, or before submission of the application for impact assessment. Their implementation shall require close cooperation with local communities and public trust. That was why we focused our activities on intensive communication of the benefits of wind power.

BIOMETHANE

As part of the Energy and Biological Waste Recovery Centre (EBWRC) projects and together with its partner – BRANTNER Slovakia s.r.o., SPP launched into operation in 2024 the optical sorting line as the first stage of EBRWC Nové Zámky. This line sorts mixed municipal and plastic waste, allowing for biomethane production from biowaste following completion of the biological stage.

The procurement of biological stage technology for Nové Zámky should begin in 2025. The decisions regarding the development and completion of other EBWRC projects shall be made in coordination with BRANTNER Slovakia s.r.o.

More information on SPP's strategy and targets can be found in the sustainability reporting section.

7 PEOPLE IN SPP

The fundamental key to SPP's success is its employees, their motivation and commitment, and open and transparent communication. A favourable working environment, a high-level corporate culture, and shared values, are all prerequisites for the successful provision of services and achievement of set corporate goals.

Collective bargaining took place in 2024, resulting in the new Collective Agreement for 2025 and 2026. In the coming years, SPP shall continue to provide premium conditions in the fields of remuneration (target bonus, Christmas bonus and work jubilee bonuses), working hours (flexible working hours, working from home), benefits relating to recuperation, health care, holidays, and time off beyond legal entitlement.

In 2024, a particular area of focus for SPP was the topic of mental and physical health. In cooperation with the League for Mental Health, SPP participated in the preparation of the unique First Aid for Mental Health program and trained 70 SPP employees in mental health issues. SPP has been among the first employers in Slovakia to receive the "Trained Golden Souls" certificate since 2024. This certification recognises the

environment and culture of an organisation that promotes the mental health of people working in SPP through education, relevant policies, and targeted long-term support from top leaders.

As part of the regular Health Days, SPP organised interesting workshops and lectures focused on balanced nutrition, a healthy lifestyle, and wellbeing. The opportunity to use sporting apps, such as the Multisport Card or UpBalance, contributed to promoting a healthy lifestyle. These activities form part of the broader support for diversity and inclusion, on which SPP has been systematically working through a special working group composed of colleagues from key organisational units, namely the Human Resources Section, the Corporate Communications Section, the Marketing Section, and the Regulation and Compliance Section.

SPP also continued to award teams and employees in the regular annual internal competitions Best Team of the Year, Best Employee of the Year, and Best Colleague of 2024. In this competition, SPP recognises and highlights the initiative, special contribution, and teamwork in achieving set corporate goals.

In 2024, SPP established new collaborations with universities and university students. SPP concluded a Memorandum of Understanding and Cooperation with the Slovak University of Technology in Bratislava and the University of Žilina in Žilina. At the University of Economics in Bratislava, SPP collaborated on the Power Sector Club semester project. By this cooperation, SPP wishes to connect education and science with practice, develop energy literacy among young people, and utilise the potential of talented students in SPP projects and activities.

More information on people in SPP can be found in the sustainability reporting section.

8 SOCIAL RESPONSIBILITY

SPP pursues activities in the field of social responsibility, philanthropy, and sponsorship, mostly based on long-term partnerships, either directly or via non-profit organisations of which it is a founder, i.e. Nadácia SPP (the SPP Foundation) and Ekofond SPP, as well as the SPP Gallery and the Slovak Gas Museum. These mainly relate to protecting the natural and cultural heritage of Slovakia, environmental protection, supporting culture, art, education, communities, disadvantaged groups, and sports activities.

In 2024, the SPP Foundation and Ekofond SPP supported community-benefit projects worth a total of €3163702.66, of which the SPP Foundation provided support in 2024 through grant schemes or through the partnerships program in the amount of €2606851.28, and Ekofond SPP implemented activities and projects in accordance with its purpose amounting to €556851.38 in 2024. The support for community-benefit projects by the SPP Foundation through the allocation of 2% of income tax amounted to €1855902.28.

PROTECTION OF CULTURAL HERITAGE OF SLOVAKIA AND PROMOTION OF CULTURE AND ART

The SPP Foundation has long supported the protection of Slovakia's cultural heritage. For the 17th time in 2024, the SPP Foundation was the general partner of the "Fénix – Cultural Monument of the Year" competition announced by the Ministry of Culture of the Slovak Republic. The aim of the competition is to reward the efforts of owners of national cultural monuments, volunteers and local governments that invest not only considerable funds into rescuing monuments, but also their energy and time, thereby helping to preserve the country's cultural heritage for future generations.

As a general partner, the SPP Foundation awards the prize for the most beautiful renovated/ restored monument under the official name "Fénix - SPP Foundation Award" based on a public vote. For more information about the Fénix – Cultural Monument of the Year competition and about restored national cultural monuments, please visit www.kpr-fenix.sk.

The SPP Gallery has played an integral part in supporting art and culture since 2000. Since its opening, it has hosted more than 170 exhibitions in various fields of the fine arts. Paintings, photographs, and sculptures have all found their place in the gallery. For instance, art enthusiasts had the chance to admire the POETICA exhibition by two talented artists Zuzana Schmidt and Maximilián Čutek. Both artists were inspired by poetry, which came to life on canvas through painting and materialised in space in the form of sculptures. Visitors could also admire the beautiful artistic symbiosis of the two artists and the unusual confrontation between paintings and sculptures during a guided tour. The SPP Gallery organised 6 exhibitions in 2024.

In 2024, SPP was also the main partner of the 30th jubilee annual ART FILM International Film Festival in Košice. In an effort to support playful education and introduce children to culture, SPP also supported the largest family festival in Slovakia – BEHIND 7 HILLS.

The Slovak Gas Museum has been mapping the past and present of the gas industry in our country for 28 years. With more than 600 exhibits, this museum is one of a kind in Slovakia. Nowadays, it also focuses on educating children and young people in energy efficiency, environmental protection, and sustainability. In 2024, more than 1300 visitors visited this museum.

SUPPORTING SPORTS

SPP has been a member of the Paralympic family for 20 years with the aim of supporting the combination of sport, diversity, and inclusion. In 2024, we were a proud partner of the Slovak Paralympic Team that represented our country at the Summer Paralympic Games in the French capital of Paris. This time, the unbreakable will to win, the energy, talent and determination, translated into 5 medals for our athletes, also thanks to SPP's long-term support. Together with the Paralympians, we prepared the TV communication campaign called Unbreakable.

SPP's partnership with sprinter Ján Volko continued in 2024. The communication of this partnership greatly benefited from his excellent results in 100 and 200 meter sprints. SPP has enthusiastically followed the successes of many Slovak athletes, e.g. from the Slovak Skiing Association, the Slovak Karate Association, Slávia Banská Bystrica, the Matej Tóth Sports Academy, and other clubs.

PROVISION OF GENERALLY BENEFICIAL SERVICES IN THE FIELD OF ENVIRONMENTAL PROTECTION AND EDUCATION

Ekofond SPP focuses its activities mainly on supporting better energy efficiency, the development of RES utilisation, the protection of biodiversity and the environment, as well

as the promotion of education. Ekofond SPP implements its support through community-benefit projects and activities that bring benefits to local communities in all regions of Slovakia, as well as society as a whole.

With the nationwide competition for schools "Greenfluencers and Energy", the e-learning program "Green Mission", and workshops on the topics "Energy and Environment" and "Social Networks and Critical Thinking", Ekofond SPP connects activities in the field of sustainability and environmental protection with education. It thus combines elements of environmental education with the development of energy literacy and promotes team cooperation and communication.

This generates the interest of children and youth in innovations in the areas of energy efficiency, smart technologies, and the utilisation of various sources of energy through the interactive SMART ENERGY exhibition, which is on display not only in the Slovak Gas Museum, but also at four secondary schools where the Energy Equipment of Buildings Technician (EEBT) study course is taught.

Since 2010, this course has enjoyed growing interest among students who have the opportunity to study it at seven secondary schools throughout Slovakia. The EEBT study course was established under the auspices of Ekofond SPP and is one of the responses to ever-increasing challenges in the field of the green economy and the development of renewable sources. The study course has long reflected the demand on the labour market for

high-quality and qualified experts in the field of technical and energy equipment of buildings.

In 2024, Ekofond SPP continued in its cooperation with the Forrest Civic Association in the protection of forests and their original gene pool in the Tatra mountains. Between 2021 and 2024, a total of 705 century-old fir trees were saved in various TANAP locations through Ekofond SPP. The average age of these firs, measuring up to 26 metres in height, ranges from 115 to 140 years. By their reproductive ability, the saved trees ensure the natural renewal of the forest cover. The trees are carefully selected so that by purchasing them the largest possible area is protected. The total area of forests protected from logging in the localities of Kežmarské Žľaby, Kráľovská Ľubeľa, Poš, and Spišská Belá comes to more than 70 000 m².

In 2024, Ekofond SPP continued to take care of wetlands at the Švihrová and Brezové locations spanning an area of approximately 73 500 m², involving the felling of young trees and mature trees, one-time mulching, mowing, removing biomass from a peatland area, and adjusting their hydrological regime.

As an ecosystem, a wetland contributes to the cooling of the atmosphere by accumulating the organic matter of dead plants, in which a certain amount of CO₂ had been stored during their life (some CO₂ may be released back into the atmosphere when a plant dies, but this amount is usually lower than the amount of assimilated and subsequently sequestered CO₂, which varies depending on the peatland, usually representing

30-70 kg of carbon per cubic meter of peat). The following habitats of European importance are found in the concerned localities of Švihrová and Brezové:

- 3160 Vo3 Natural dystrophic lakes and ponds
- 7140 Ra3 Transition mires and quaking bogs
- 7230 Ra6 Alkaline fens
- 91D0 Ls73 Bog woodland
- 6510 Lk1 Lowland hay meadows
- 6430 Lk5 Hydrophilous tall herb fringe communities of plains and of the montane to alpine levels
- Lk6 Waterlogged mountain and foothill meadows
- Kr8 Willow thickets of lakes and ponds

The aforementioned areas are also home to important animal species of European importance: the yellow-bellied toad (*Bombina variegata*), the narrow-mouthed whorl snail (*Vertigo angustior*), and the varnished hook-moss (*Hamatocaulis vernicosus*).

As part of the "We Do Not Sleep, We Buzz With SPP" project, Ekofond SPP continues to support organic beekeeping. The project includes four hives located in Bratislava, which are taken care of by SPP employees on a voluntary basis. The other four hives are located at the SPP site in Košice. Bees are an important pollinator and also an important bioindicator of the quality of the environment.

The project continues to provide information to support education in schools through the published methodological guide for teachers

and worksheets for students, which teachers can incorporate into various study courses (Language and Communication, Mathematics and Working with Information, Nature and Society, Man and Values, Man and the Working World, Art and Culture, Health and Exercise) and the "Land of Bees" board game.

In the course of 2024, we completed the "Focus on Bees" educational materials. These materials are aimed at connecting the natural world with the world of humans, to point out the links and bonds that enable the ecosystem to remain in balance and, using the example of the life of bees in nature, to help children better understand complex topics such as energy, flows of substances, the transformation of energy and substances in nature, energy-management by bees on the one hand, and how humans utilise energy on the other hand.

In cooperation with the Slovak University of Agriculture in Nitra, Ekofond SPP continued in 2024 at the SPP site in Bratislava not only to secure and maintain the planting of nectar-producing plants and low-maintenance flower beds planted with perennials and bulbous plants, which support diversity and retain a greater volume of water in the soil than a lawn, but also to prepare proposals for the revitalisation of other areas.

In 2024, as part of the "Let's Stop the Asian Hornet" project aiming to protect pollinators and biodiversity from the invasive Asian hornet (*Vespa velutina nigrithorax*), Ekofond SPP provided the material and technical equipment for 46 volunteer fire departments at

municipalities and towns for eliminating Asian hornets and their nests.

Thanks to Ekofond SPP, the 1st Slovak mobile app Stop the Hornet was created to report incidence of this species, being connected to the Rapid Warning System of the State Nature Protection Agency of the Slovak Republic, allowing fast and effective reporting of suspicious occurrences in the Slovak Republic. Using this app, the first actual occurrence of the Asian hornet in Slovakia was reported and confirmed.

The educational and awareness-raising online

campaign for the public was also launched, which included the premiere of the "Asian Hornet - a Threat to Our Pollinators and Biodiversity" documentary film created by EkoFond SPP. Four professional training courses were also held for volunteer firefighters, beekeepers, gardeners, scientists, and others interested in the Asian hornet topic, with the lectures given by experts from Slovakia and abroad.

Overview of support provided in the form of SPP Foundation's grant schemes

Grant scheme name	Number of supported applications	Support amount in euros
Employee Grant Scheme	61	47 118.66
One Step Ahead grant scheme	42	60 000.00
Municipality scheme – Eustream's sub-scheme	42	203 504.10
Crutch grant scheme	85	58 320.00
You Too Engage In Sports! grant scheme	135	198 018.89
Let's Do It With SPP for Our Children grant scheme	65	150 000.00
Supporting Individuals In Need grant scheme	279	443 744.75
Together With SPP For Communities grant scheme	107	196 609.50
Eustream's donations	18	30 630.00
Special Grant Scheme for Banská Štiavnica	0.00	0.00
Special Grant Scheme for SPP Employees	5	7 960.00
Fénix – Cultural Monument of the Year	3.00	30 000.00
TOTAL:	842	1 425 905.90

PHILANTHROPY, SUPPORT FOR DISADVANTAGED GROUPS AND SOCIETY DEVELOPMENT THROUGH THE SPP FOUNDATION

In the course of 2024, the SPP Foundation announced multiple grant schemes, such as "Together With SPP For Communities" for supporting and connecting different generations in Slovak communities, "One Step Ahead" for the rehabilitation of children and adults suffering

from neurological disorders of the locomotor system, "Let's Do It With SPP For Our Children" for educational facilities that implement formal and non-formal education programmes for children and youth, the "Employee Grant Programme" for SPP employees so that they are able to provide assistance where they deem it necessary, and the "Crutch" grant scheme for social service providers, organisations, and institutions dedicated to assisting people with special needs.

An overview of the support provided by the SPP Foundation is presented in the tables below.

Overview of support provided by the SPP Foundation in the form of partner projects

Support area	2024	2024
	Number of supported applications	Support amount in euros
Protection and promotion of health	25	153 680.00
Promotion and development of sports	28	233 215.00
Provision of social assistance	21	156 520.00
Preservation of cultural values	74	396 540.00
Promotion of education	36	158 830.38
Protection and creation of the environment	7	44 160.00
Science and research	3	34 000.00
Protection of human rights	2	4 000.00
TOTAL:	196	1 180 945.38

9 FINANCIAL STATEMENTS

Individual Financial Statements of SPP (selected data in € million)

	Year ended 31 December 2024	Year ended 31 December 2023
Revenues from customer contracts	2768	3924
NG and E compensations	437	777
Other gains and losses	(75)	(94)
Purchase of natural gas, purchase of electricity and consumption of material and energy, change in inventories, capitalisation	(2800)	(4396)
Storage of natural gas and other services	(115)	(123)
Depreciation and amortisation	(10)	(9)
Personnel costs	(41)	(35)
Adjustments to bad or doubtful receivables, net	(8)	(3)
Provisions and impairment losses, net	0	(3)
Operating profit	156	38
Profit/(loss) from investments	198	303
Cost of financing	(3)	(20)
Profit/(loss) before tax	351	321
Income tax	(72)	(31)
PROFIT FOR THE PERIOD	279	290

Consolidated Financial Statements of SPP Group (selected data in € million)

	Year ended 31 December 2024	Year ended 31 December 2023
Revenues from customer contracts	3043	4182
NG and E compensations	437	777
Other gains and losses	(81)	(96)
Purchase of natural gas, purchase of electricity and consumption of material and energy, change in inventories, capitalisation	(3053)	(4629)
Storage of natural gas and other services	(121)	(127)
Depreciation and amortisation	(10)	(9)
Personnel costs	(43)	(37)
Adjustments to bad or doubtful receivables, net	(8)	(3)
Provisions and impairment losses, net	-	(4)
Operating profit	164	54
Profit/(loss) from investments	24	10
Share in profits of affiliated companies and joint ventures	247	193
Cost of financing	(3)	(21)
Profit/(loss) before tax	432	236
Income tax	(74)	(34)
PROFIT FOR THE PERIOD	358	202
Net profit belonging to:		
SPP shareholders	358	202
Minority holdings of other owners of subsidiaries	-	-
Total	358	202

10.1 Independent Auditor's Limited Assurance Report on Consolidated Sustainability Statement



Deloitte Audit s.r.o.
Pribinova 34
811 09 Bratislava
Slovak Republic

Tel: +421 2 582 49 111
deloitteSK@deloitteCE.com
www.deloitte.sk

Registered in the Business
Register of the City Court Bratislava III
Section Sro, File 4444/B
Company ID: 31 343 414
VAT ID: SK2020325516

1BC746E505953678D2AF987DDD0660EB

SLOVENSKÝ PLYNÁRENSKÝ PRIEMYSEL, a.s.

INDEPENDENT AUDITOR'S LIMITED ASSURANCE REPORT ON CONSOLIDATED SUSTAINABILITY STATEMENT

To the Shareholder, Supervisory Board and Board of Directors of Slovenský plynárenský priemysel, a.s. and the Audit Committee:

We have conducted a limited assurance engagement on the Consolidated Sustainability Statement of Slovenský plynárenský priemysel, a.s. (the "Company") and its subsidiaries (the "Group") included in the "Consolidated Sustainability Statement" section of the Consolidated Annual Report as at 31 December 2024 and for the year then ended (the "Consolidated Sustainability Statement").

Identification of Applicable Criteria

The Consolidated Sustainability Statement was prepared by management of the Company in order to satisfy the requirements of Article 20g of Act No. 431/2002 Coll. on Accounting as amended (the "Act on Accounting") implementing 29(a) of Directive 2013/34/EU of the European Parliament and of the Council, including:

- Compliance with the European Sustainability Reporting Standards introduced by Commission Delegated Regulation (EU) of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council (the "ESRS"), including that the process carried out by the Group to identify the information reported in the Consolidated Sustainability Reporting (the "Process") is in accordance with the description set out in Note IRO-1 Description of the process to identify and assess material impacts, risks and opportunities; and
- Compliance of the disclosures in Note 10.3 EU Taxonomy compliant reporting of sustainable investments of the Consolidated Sustainability Reporting with Article 8 of Regulation (EU) 2020/852 of the European Parliament and of the Council (the "Taxonomy Regulation").

Inherent Limitations in Preparing the Consolidated Sustainability Reporting

The criteria, nature of the Consolidated Sustainability Statement, and absence of long-standing established authoritative guidance, standard applications and reporting practices allow for different, but acceptable, measurement methodologies to be adopted which may result in variances between entities. The adopted measurement methodologies may also impact the comparability of sustainability matters reported by different organisations and from year to year within an organisation as methodologies evolve.

In reporting forward-looking information in accordance with the ESRS, management of the Group is required to prepare the forward-looking information on the basis of disclosed assumptions about events that may occur in the future and possible future actions by the Group. The actual outcome is likely to be different since anticipated events frequently do not occur as expected.

In determining the disclosures in the Consolidated Sustainability Statement, management of the Group interprets undefined legal and other terms. Undefined legal and other terms may be interpreted differently, including the legal conformity of their interpretation and, accordingly, are subject to uncertainties.

This is a translation of the original auditor's report issued in the Slovak language to the accompanying financial statements translated into the English language.

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited ("DTTL"), its global network of member firms, and their related entities (collectively, the "Deloitte organization"). DTTL (also referred to as "Deloitte Global") and each of its member firms and related entities are legally separate and independent entities, which cannot obligate or bind each other in respect of third parties. DTTL and each DTTL member firm and related entity is liable only for its own acts and omissions, and not those of each other. DTTL does not provide services to clients. Please see www.deloitte.com/sk/en/about to learn more.

Responsibilities of Management and Those Charged with Governance for the Consolidated Sustainability Statement

Management of the Group is responsible for designing and implementing a process to identify the information reported in the Consolidated Sustainability Statement in accordance with the ESRS and for disclosing this process in Note IRO-1 Description of the process to identify and assess material impacts, risks and opportunities of the Consolidated Sustainability Statement.

This responsibility includes:

- Understanding the context in which the Group’s activities and business relationships take place and developing an understanding of its affected stakeholders;
- The identification of the actual and potential impacts (both negative and positive) related to sustainability matters, as well as risks and opportunities that affect, or could reasonably be expected to affect, the Group’s financial position, financial performance, cash flows, access to finance or cost of capital over the short-, medium-, or long-term;
- The assessment of the materiality of the identified impacts, risks and opportunities related to sustainability matters by selecting and applying appropriate thresholds; and
- Making assumptions that are reasonable in the circumstances.

Management of the Group is also responsible for the preparation of the Consolidated Sustainability Statement, in accordance with Article 20g) of the Act on Accounting implementing Article 29(a) of Directive 2013/34/EU of the European Parliament and of the Council, including:

- Compliance with the ESRS;
- Preparing the disclosures in Note 10.3 EU Taxonomy compliant reporting of sustainable investments of the Consolidated Sustainability Statement, in compliance with Article 8 of the Taxonomy Regulation;
- Designing, implementing and maintaining such internal controls that management determines are necessary to enable the preparation of the Consolidated Sustainability Statement that is free from material misstatement, whether due to fraud or error; and
- The selection and application of appropriate sustainability reporting methods and making assumptions and estimates about individual sustainability disclosures that are reasonable in the circumstances.

Those charged with governance are responsible for overseeing the Group’s sustainability reporting process.

Auditor’s Responsibilities

We conducted our limited assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised), Assurance Engagements Other than Audits or Reviews of Historical Financial Information, issued by the International Auditing and Assurance Standards Board (IAASB) (“ISAE 3000 (Revised)”).

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our objectives are to plan and perform the assurance engagement to obtain limited assurance about whether the Consolidated Sustainability Statement is free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that includes our conclusion. Misstatements can arise from fraud or error and are considered material if, individually or in aggregate, they could reasonably be expected to influence decisions of users taken on the basis of the Consolidated Sustainability Statement as a whole.

As part of a limited assurance engagement in accordance with ISAE 3000 (Revised) we exercise professional judgement and maintain professional scepticism throughout the engagement.

Our responsibilities in respect of the Consolidated Sustainability Statement, in relation to the Process, include:

- Obtaining an understanding of the Process but not for the purpose of providing a conclusion on the effectiveness of the Process, including the outcome of the Process;
- Designing and performing procedures to evaluate whether the Process is consistent with the Group's description of its Process, as disclosed in Note IRO-1 Description of the process to identify and assess material impacts, risks and opportunities.

Our other responsibilities in respect of the Consolidated Sustainability Statement include:

- Obtaining an understanding of the Group's control environment, processes and information systems relevant to the preparation of the Consolidated Sustainability Statement but not evaluating the design of particular control activities, obtaining evidence about their implementation or testing their operating effectiveness;
- Identifying disclosures where material misstatements are likely to arise, whether due to fraud or error;
- Designing and performing procedures responsive to disclosures in the Consolidated Sustainability Statement where material misstatements are likely to arise. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Independence Requirements and Quality Management

We are independent of the Group in accordance with the provisions of Act No. 423/2015 Coll. on Statutory Audit and on Amendment to and Supplementation of Act No. 431/2002 Coll. on Accounting, as amended, as amended (the "Act on Statutory Audit") related to independence and ethical requirements, including the Code of Ethics for Auditors, that are relevant to our limited assurance engagement of the Consolidated Sustainability Statement and we have fulfilled our other ethical responsibilities in accordance with these requirements.

Our firm applies International Standard on Quality Management 1 (ISQM 1) and, accordingly, maintains a comprehensive system of quality management, including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

Summary of the Work Performed

A limited assurance engagement involves performing procedures to obtain evidence about the Consolidated Sustainability Statement.

The nature, timing and extent of procedures selected depend on professional judgement, including the identification of disclosures where material misstatements are likely to arise, whether due to fraud or error, in the Consolidated Sustainability Statement.

In conducting our limited assurance engagement, with respect to the Process, we:

- Obtained an understanding of the Process by:
 - Performing inquiries to understand the sources of the information used by management (e.g. stakeholder engagement, business plans and strategy documents); and
 - Reviewing the Group's internal documentation of its Process; and
- Evaluated whether the evidence obtained from our procedures about the Process implemented by the Group was consistent with the description of the Process set out in Note IRO-1 Description of the process to identify and assess material impacts, risks and opportunities.

In conducting our limited assurance engagement, with respect to the Consolidated Sustainability Statement, we:

- Obtained an understanding of the Group's reporting processes relevant to the preparation of its Consolidated Sustainability Statement by:
 - Performing inquiries to understand the Group's control environment, processes and information systems relevant to the preparation of the Consolidated Sustainability Statement;
- Evaluated whether material information identified by the Process to identify the information reported in the Consolidated Sustainability Statement is included in the Consolidated Sustainability Statement;
- Evaluated whether the structure and the presentation of the Consolidated Sustainability Statement is in accordance with the ESRS;
- Performed inquiries of relevant personnel and analytical procedures on selected disclosures in the Consolidated Sustainability Statement;

- Performed substantive assurance procedures based on a sample basis on selected disclosures in the Consolidated Sustainability Statement;
- Obtained evidence on the methods for developing material estimates and forward-looking information and on how these methods were applied;
- Obtained an understanding of the process to identify taxonomy-eligible and taxonomy-aligned economic activities and the corresponding disclosures in the Consolidated Sustainability Statement;

Limited Assurance Conclusion

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the Consolidated Sustainability Statement is not prepared, in all material respects, in accordance with Article 20g) of the Act on Accounting implementing Article 29(a) of Directive 2013/34/EU of the European Parliament and of the Council, including:

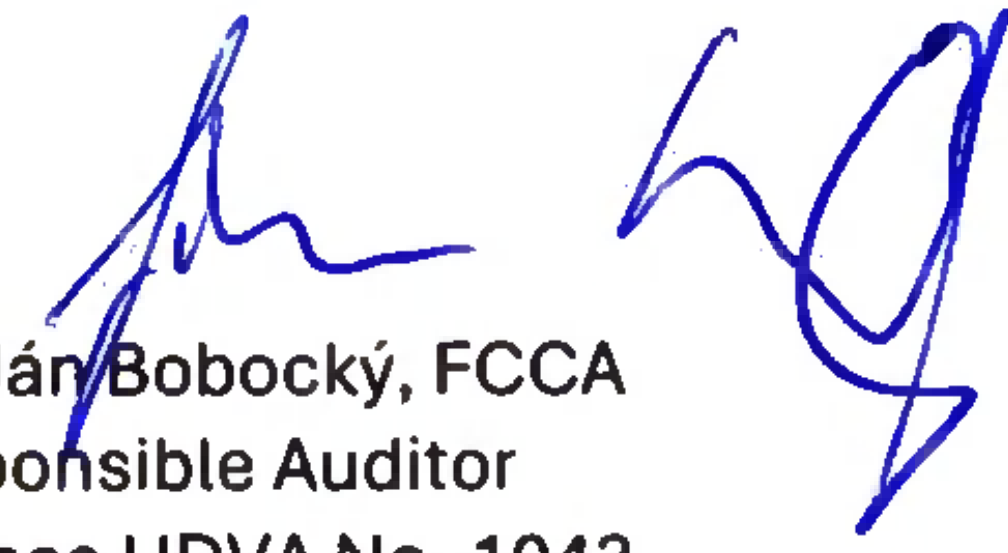
- Compliance with the ESRS, including that the process carried out by the Group to identify the information reported in the Consolidated Sustainability Statement is in accordance with the description set out in Note IRO-1 Opis postupov na identifikáciu a posúdenie významných vplyvov, rizík a príležitostí; and
- Compliance of the disclosures in Note 10.3 EU Taxonomy compliant reporting of sustainable investments of the Consolidated Sustainability Reporting with Article 8 of the Taxonomy Regulation.

Other Matter

Our assurance engagement does not extend to information in respect of earlier periods.

Under the Act on Accounting, the Company is not required to prepare consolidated sustainability reporting as at 31 December 2024. The Company has voluntarily decided to obtain limited assurance on consolidated sustainability reporting.

Bratislava, 29 May 2025



Ing. Ján Bobocký, FCCA
Responsible Auditor
Licence UDVA No. 1043
Sustainability Licence UDVA No. 45

On behalf of
Deloitte Audit s.r.o.
Licence SKAu No. 014
Sustainability Licence UDVA No. 5

10.2 ESRS 2 General Disclosures

BP-1 General basis for preparation of sustainability statements

Regular compilation of statements is a means for evaluating the impacts of SPP's activities and the fulfilment of set targets in the future and, at the same time, a means of providing transparent information about SPP's results and measures in the field of sustainability.

This Sustainability Statement has been prepared on a consolidated basis, whereby the scope of consolidation is identical as in the case of the Financial Statements and is compiled for the period from 1 January 2024 to 31 December 2024 as part of the SPP Annual Report. The stated period corresponds to the period for which SPP compiles its annual Financial Statements.

The basis for the compilation of this Sustainability Statement are the standards under Directive (EU) 2022/2464 as regards corporate sustainability reporting (Corporate Sustainability Reporting Directive – CSRD) based on the framework of the European Sustainability Reporting Standards (ESRS), which were transposed by the applicable provisions of Act No. 431/2002 Coll. on accounting. This Sustainability Statement also includes disclosures under the EU Taxonomy Regulation (Article 8 of Regulation (EU) 2020/852).

The information provided in this Sustainability Statement describes the activities and impacts

of SPP, SPP CZ and SPP CNG. In special cases, it is stated within individual chapters that the disclosure requirements do not incorporate information for SPP CZ and SPP CNG, given its low significance or due to the fact that the activities of SPP CZ and SPP CNG do not cause any impacts in these areas.

The option to omit specific information due to intellectual property, know-how, or innovation results, or possibly the option to omit information on unfinished matters or matters that are under negotiation, was used in this Sustainability Statement.

Due to the absence of guidelines and standard reporting practices, the consolidated sustainability reporting allows for the use of different measurement methodologies, which may lead to differences between accounting entities and affect data comparability. In reporting forward-looking information under ESRS, the statutory body must base its reporting on the assumptions of future events that may differ from reality. The interpretation of undefined terms introduces uncertainty as it may subjectively differ.

This Sustainability Statement covers both the upstream and downstream parts of the value chain. More detailed information about the upstream and downstream parts of the value chain is provided in section SBM-1 Strategy, business model and value chain.

The contact person for the purposes of this Sustainability Statement is Juraj Adamica, Sustainability and Regulatory Affairs Manager, SPP.

BP-2 Disclosures in relation to specific circumstances

For the purposes of this statement, SPP defines short-term, medium-term and long-term purposes as defined by the ESRS 1 standard, paragraph 6.4.

The key metrics in this statement are calculated using direct sources. This also applies to impacts of the SPP Group's key activities, the supply of gas and electricity to customers, with which direct data were used from entities responsible for measuring gas and electricity consumption. In preparing this statement, SPP used estimates only for the values of the average number of training hours of personnel employed in SPP CZ and SPP CNG provided in section S1-13 Training and skills development metrics.

In calculating the amount of greenhouse gas emissions caused by electricity use (whether directly by the SPP Group or by customers), including the calculation of greenhouse gas emission savings resulting from implemented or planned measures of SPP in Chapter E1 Climate Change, the emission factor of the supplied electricity within the so-called residual energy mix for 2023 was used. The emission factor of the supplied electricity within the so-called residual energy mix for the 2024 period will be published at the turn of May and June 2025.

This procedure results from the methodology and calculation published by the Association of Issuing Bodies (AIB), which recalculates the emission intensity of the energy mix of electricity supplied in all EU countries and, at the same time, all applied guarantees of origin. These data shall be updated in the coming years based on the emission factor of supplied electricity as part of the so-called residual energy mix for 2024.

The base year used in compiling this statement is 2024. This statement does not contain any comparison with previous periods, as it is the first statement reported after the implementation of Directive (EU) 2022/2464 as regards corporate sustainability reporting by the applicable provisions of Act No. 431/2002 Coll. on accounting.

This statement does not include any information arising from other legal regulations or from generally accepted standards and frameworks for sustainability reporting. This statement does not include the incorporation of information by reference outside of this statement (this does not apply to disclosures that refer to some other disclosure listed in another part of this statement).

SPP applies the transitional provision on the gradual introduction of sustainability reporting in accordance with the provisions of ESRS 1 paragraph 10 and Appendix C to ESRS 1, in the following cases:

ESRS	Disclosure requirement
ESRS 2 SBM-3	Anticipated financial effects from material physical and transition risks and potential opportunities
E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities
E2-6	Anticipated financial effects from pollution-related, risks and opportunities
E3-5	Anticipated financial effects from water and marine resource risks and opportunities
E4-5	Impact metrics related to biodiversity and ecosystems change
E5-6	Anticipated financial effects from resource use and circular economy-related risks and opportunities

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

SPP is a joint stock company. The sole shareholder of SPP is the Slovak Republic, exercising shareholder rights through the Ministry of Economy of the Slovak Republic, which elects members of the Board of Directors and the Supervisory Board (excluding employee-elected members of the Supervisory Board). The functioning of SPP is governed by the rules set out in the basic documents and other internal management documents regulating specific processes, activities, and procedures in SPP. The basic document regulating the activities of SPP is the SPP Articles of Association.

The Board of Directors is the statutory body of SPP. It manages the company's activities and makes decisions on all matters, unless reserved by legal regulations or the Articles of Association to the purview of the General Meeting or the Supervisory Board. The SPP Board of Directors has 5 members, of whom 2 members also hold executive positions in SPP.

The CEO and the Internal Audit and Revision Section report directly to the SPP Board of Directors. The CEO manages the company's activities in between BoD meetings in accordance with the BoD's decisions. The divisions, sections and departments reporting directly to the CEO exercised the following management responsibilities in 2024:

CEO	<ul style="list-style-type: none"> Human Resources Section Corporate Communications Section Trade Division Business Development and Management of Subsidiaries Division Finance Division Corporate Affairs Division Internal Services Division
Trade Division	<ul style="list-style-type: none"> Corporate Sales Section Mass Market Sales Section Trading Section Automation and Digitalisation of Trade Section Back Office Section Marketing Section Trade Policy and Portfolio Management Section
Business Development and Management of Subsidiaries Division	<ul style="list-style-type: none"> Business Development Section Management of Subsidiaries Section
Finance Division	<ul style="list-style-type: none"> Accounting and Reporting Section Tax and Receivables Management Section Treasury Section Risk Management Department
Corporate Affairs Division	<ul style="list-style-type: none"> Legal Section Regulation and Compliance Section Analytical Support Department Administration of the Supervisory Board and BoD Department
Internal Services Division	<ul style="list-style-type: none"> Procurement and Purchasing Section IT Section Property Management Section

The SPP Supervisory Board is the supreme control body of the company, supervising the exercise of powers by the SPP Board of Directors and the implementation of the company's business activities. The Supervisory Board has 9 members. One third of the SPP Supervisory Board, i.e. 3 members, is elected by SPP employees.

The statutory body of SPP CZ is the Board of Directors with 3 members and the supervisory body of SPP CZ is the Supervisory Board with 3 members. The statutory body of SPP CNG comprises 2 managing directors; SPP CNG does not have a supervisory board.

The members of the Board of Directors and Supervisory Board of SPP are elected and recalled by the decision of the sole shareholder, the Ministry of Economy of the Slovak Republic, for a period of 5 years based on the results of a selection procedure. Details about the selection of members of the Board of Directors and Supervisory Board are set out in the Rules for Selecting SPP Bodies, in accordance with the resolution of the Government of the Slovak Republic.

The Rules for Selecting SPP Bodies fall to the full competence of the Government of the Slovak Republic and the Ministry of Economy of the Slovak Republic. The Rules for Selecting SPP Bodies set minimum requirements regarding qualifications and practical experience for members of the Board of Directors and Supervisory Board of SPP. The members of the Board of Directors and the Supervisory Board of SPP possess extensive expertise and practical experience in the power industry, law, consulting, and corporate governance, including material topics in the field of sustainability relevant to the SPP Group.

The elections of members of the Board of Directors and the Supervisory Board of SPP CZ or managing directors of SPP CNG take into account the requirements of expertise and integrity, which are governed by the internal rules of SPP. With respect to members of the SPP CZ and SPP CNG bodies, account is taken of independence requirements, which stipulate that an applicant must not have been a member of the senior management of SPP or a company wholly owned by SPP in the past 5 years or an external auditor of such a company signing the Auditor's Report, and must not have any close family relationship with any member of the senior management of SPP or a company wholly owned by SPP.

Presently, the Rules for Selecting SPP Bodies and the internal rules for electing members to SPP CZ and SPP CNG bodies do not take into account diversity criteria when electing members of the Board of Directors and the Supervisory Board.

Members of the Board of Directors and the Supervisory Board of SPP and SPP CZ and

managing directors of SPP CNG are public officials within the meaning of Constitutional Act No. 357/2004 Coll. on protecting the public interest in the exercise of duties by public officials. As public officials, members of the SPP Group's bodies are subject to strict rules prohibiting any membership in the statutory or supervisory bodies of other companies. At the same time, members of the SPP Group's bodies are required in the exercise of their duties to promote and protect the public interest, in addition to the interests of the SPP Group's companies.

Public interest is an interest that brings material or other benefit to all citizens or many citizens of the Slovak Republic. In view of the above, the SPP Group does not register any independent members of the management or supervisory bodies. Members of the SPP Group's bodies likewise transparently disclose their income and personal assets on an annual basis in the form of declarations of assets published by the National Council of the Slovak Republic.

In 2024, the bodies of SPP, SPP CZ, and SPP CNG were composed as follows:

SPP Board of Directors:

doc. Ing. Vojtech Ferencz, PhD., MBA,
Chairman of the Board of Directors
Ing. Martin Rybár,
Vice-Chairman of the Board of Directors
JUDr. Pavel Jurek,
Member of the Board of Directors
Mgr. Boris Machút,
Member of the Board of Directors
Ing. Juraj Ondris,
MBA, Member of the Board of Directors

SPP Supervisory Board:

Dr. h. c. Ing. Tibor Mikuš, PhD.,
Chairman of the Supervisory Board
Ing. Ivan Šramko,
Vice-Chairman of the Supervisory Board
Ing. Štefan Kapusta,
Member of the Supervisory Board
Ing. Róbert Gold, CA,
Member of the Supervisory Board
Ing. Martin Kohútik,
Member of the Supervisory Board
PhDr. Zuzana Ružeková,
Member of the Supervisory Board
Viera Uhrová,
Member of the Supervisory Board
Ing. Miloš Dančo,
Member of the Supervisory Board

Board of Directors of SPP CZ:

Ing. Pavel Jaroš,
Chairman of the Board of Directors
Ing. Juraj Ondris, MBA,
Vice-Chairman of the Board of Directors
Mgr. Valér Ferko,
Member of the Board of Directors

Supervisory Board of SPP CZ:

Ing. Lukáš Adámek,
Member of the Supervisory Board
Ing. Jakub Ondrejka,
Member of the Supervisory Board

Managing Directors of SPP CNG:

Ing. Peter Mozolák
Ing. Július Chvostaľ

Table 1 – Number and percentage of persons in the bodies of the SPP Group by gender

	Men (no. of persons)	Women (no. of persons)	Total (no. of persons)	Men (%)	Women (%)	Total (%)
SPP Board of Directors	5	0	5	100	0	100
SPP Supervisory Board	6	2	9*	67	22	89*
Board of Directors of SPP CZ	3	0	3	100	0	100
Supervisory Board of SPP CZ	2	0	3*	67	0	67*
Managing Directors of SPP CNG	2	0	2	100	0	100

* One seat in the Supervisory Board of SPP and SPP CZ is vacant.

Roles and responsibilities of administration, management, and supervisory bodies over sustainability aspects and oversight of impacts, risks and opportunities

SPP was established in accordance with regulations governing commercial companies in the Slovak Republic and the EU. The operation of the company, including tasks and responsibilities of SPP's bodies, is governed by the provisions of the Commercial Code and the SPP Articles of Association (publicly available), other basic documents, as well as other internal management documents regulating specific processes, activities and procedures in SPP.

In the field of sustainability management, SPP adopted the Sustainability Management Programme, which forms part of the basic documentation of SPP. The Sustainability Management Programme is a basic internal regulation defining the setting of responsibility relationships among individual employees, organisational units, and/or bodies of SPP and wholly-owned SPP subsidiaries, as well as the setting of competencies and activities related to achieving the SPP Group's sustainability.

Another part of the SPP management documentation includes the directives, methodological guidelines and orders that officially regulate specific processes/activities, procedures, establish the rules/system of their functioning in individual areas of SPP's operation and determine the responsibilities and powers

of job positions in the processes and activities regulated by the applicable regulation.

SPP has an integrated management system (IMS) implemented according to international standards ISO 9001:2015 (Quality management system), ISO 14001:2015 (Environmental management system), ISO 45001:2018 (Occupational health and safety management systems) and ISO/IEC 27001:2022 (Information security management system) in the sale of gas, electricity and services, and the operation and management of information systems, with regularly renewed certifications.

In 2024, SPP extended the certification of the quality management system, environmental management, and occupational health & safety management to include also estates in Zvolen and Košice. As an additional voluntary tool to help assess, manage and improve the environmental conduct of our companies, SPP also introduced the Eco-Management and Audit Scheme (EMAS) at its headquarters. As part of its business activities, SPP obtained certification as a biofuels trader (biomethane) under the International Sustainability and Carbon Certification System (ISCC EU).

The SPP Board of Directors determines the strategic direction of SPP in the field of sustainability management by:

- a) setting and enforcing the basic principles of sustainability management, including ensuring compliance of the business model with the goals in limiting global warming to 1.5°C and achieving climate neutrality by 2050,
- b) approving the SPP Sustainability Strategy 2050, including the short-term, medium-term and

- long-term targets set out therein and their progressive updating,
- c) ensuring the compliance of the Business Plan and the 5-year Strategic Plan of SPP with the SPP Sustainability Strategy 2050 and the targets set therein,
- d) monitoring SPP's impacts, sustainability risks, and the fulfilment of the SPP Sustainability Strategy 2050 and the targets set therein,
- e) approving individual goals in the field of achieving SPP's sustainability within the performance evaluation system of senior employees of the SPP Group,
- f) guiding and supporting our employees with the aim of motivating them to fulfil the targets for achieving SPP's sustainability.

In accordance with the SPP Articles of Association, the Supervisory Board monitors and supervises how the Board of Directors exercises its powers. The Sustainability Management Programme is binding for members of the SPP Board of Directors, SPP employees, members of the bodies of SPP CZ and SPP CNG, and their employees.

The Sustainability Management Programme also defines the competencies and tasks of other organisational units, such as the management meeting of SPP, Sustainability Manager, and senior employees of the SPP Group.

The management meeting of SPP is an advisory body to the CEO of SPP, which discusses operational and conceptual issues relating to the company's activities and management, and submits proposals for their resolution to the SPP CEO. The members of the management meeting of SPP are the CEO, SPP division directors, the

Human Resources Section Director, the Legal Section Director, the Corporate Communications Section Director, the Internal Audit and Revision Section Director, and the CEO's advisor.

In accordance with the Sustainability Management Programme, at least twice a year the management meeting of SPP discusses current issues concerning sustainability management, in particular proposals of measures and specific tasks as part of the:

- a) compilation of the draft SPP Annual Report and issues in the field of reporting material non-financial impacts of the SPP Group, monitoring the implementation of targets set out in the SPP Sustainability Strategy 2050, risks in the field of sustainability, and measures for eliminating them,
- b) preparation of the updated SPP Sustainability Strategy 2050 and preparation of the Business Plan and the 5-year Strategic Plan of SPP in accordance with the SPP Sustainability Strategy 2050,
- c) procurement and sourcing process for resources necessary to implement the objectives set out in the SPP Sustainability Strategy 2050,
- d) preparation of individual target proposals in the field of achieving sustainability.

The proposed measures and specific tasks are submitted by the management meeting of SPP to the SPP Board of Directors for approval.

The Sustainability Manager is an SPP employee at the Regulation and Compliance Section, reporting

organisationally to the Compliance Manager who, in accordance with the Sustainability Programme, performs the following:

- a) coordinates the system for reporting and documenting material impacts of the SPP Group's activities and reporting of non-financial information and impacts of the SPP Group's activities,
- b) coordinates the preparation of the draft SPP Sustainability Strategy 2050, the targets set out therein and updates thereof, and monitors their implementation and compliance of the 5-year Strategic Plan of SPP with the SPP Sustainability Strategy 2050,
- c) coordinates the incorporation of sustainability management measures into the SPP Group's daily activities and processes,
- d) cooperates with the Risk Management Section in assessing sustainability risks,
- e) informs the SPP Board of Directors and the SPP CEO about the development of the regulatory framework with an impact on the setting of the sustainability management system in SPP,
- f) provides methodological support in the field of sustainability management across the SPP Group.

The Sustainability Manager participates in the meetings of the SPP Board of Directors and the management meeting of SPP, at which issues related to sustainability management are discussed.

In particular, the Sustainability Management Programme defines for senior employees of the SPP Group the following responsibilities within the scope of their managerial powers:

- a) to fulfil tasks arising from the SPP Sustainability Strategy 2050 in the interest of meeting the targets set therein and to inform the Sustainability Manager about the fulfilment status of these tasks,
- b) to identify risks in achieving sustainability targets within the scope of their managerial powers and to inform the Sustainability Manager about them, along with proposed measures and tasks to eliminate them,
- c) to actively cooperate with the Sustainability Manager and other senior employees of the SPP Group in the implementation of the SPP Sustainability Strategy 2050 and targets set therein, also in areas beyond the scope of their managerial powers,
- d) to integrate sustainability management tasks and targets into applicable existing internal procedures and into employee evaluation processes within their scope of managerial powers.

As part of its sustainability management, SPP has also established the following working groups: (a) for sustainability and (b) for promoting diversity and inclusion. Their purpose is to coordinate multiple organisational units in meeting the targets set out in the SPP Sustainability Strategy 2050, support an active approach to achieving sustainability across the SPP Group, and better sharing of information on measures and activities in sustainability management.

The internal audit system is applied via the separate Internal Audit and Revision Section, which reports directly to the Board of Directors and provides SPP's management, the SPP Board

of Directors, and SPP Supervisory Board with independent reassurances as to what extent the functioning of the control system at the first and second level complies with the requirements of the Board of Directors and SPP's management.

The SPP Board of Directors and the statutory bodies of SPP CZ and SPP CNG adopt all necessary measures to ensure that the SPP Group can rely on an adequate and effective internal audit, including adequate material and personnel conditions for due performance of internal audit activities.

The process of determining goals for achieving the SPP Group's sustainability is set out in the Sustainability Management Programme. When determining targets, SPP takes into account the latest scientific developments, scientific principles and know-how, assessment of the dual materiality of impacts, risks and opportunities related to the activities of the SPP Group, and the reported impacts of the SPP Group within individual topics covered by this statement. The sequence of steps in setting the targets and their updates is as follows:

- a) determination of targets, risks and opportunities related to the activities of the SPP Group and reporting of impacts of the SPP Group within individual topics,
- b) determination of targets reflecting the assessment of dual materiality of impacts, risks and opportunities related to the activities of the SPP Group and the reported impacts of the SPP Group within the individual topics covered through the adoption or updating of the SPP Sustainability Strategy 2050,

- c) implementation of measures and tasks in the interest of achieving the targets,
- d) regular monitoring and evaluation of the achievement of targets and identification of target achievement risks,
- e) proposal of additional measures and tasks to eliminate risks and in the interest of achieving the targets, and
- f) proposal of updated target, if its achievement is not possible even with additional measures and tasks.

SPP coordinates the monitoring of sustainability target implementation through the Sustainability Manager, with other employees providing him/her with necessary cooperation. Senior employees of the SPP Group regularly inform the Sustainability Manager about the achievement status of SPP's sustainability targets. Senior employees of the SPP Group also regularly inform the Sustainability Manager and the employee of the Risk Management Section about the potential risks of failing to achieve SPP's sustainability targets.

At least once a year, the Sustainability Manager informs the management meeting of SPP about the status of targets, along with proposed measures and specific tasks necessary to implement the targets. At the same time, the Sustainability Manager submits to the SPP Board of Directors a report on the monitoring of SPP's sustainability targets, at least once a year. If so required from the results of the monitoring of targets for achieving SPP's sustainability, the Sustainability Manager submits to the SPP Board of Directors a proposed update to the SPP Sustainability Strategy 2050 and the targets set therein, along with a target monitoring report.

The targets for achieving SPP's sustainability are approved by the SPP Board of Directors as part of the approval of the SPP Sustainability Strategy 2050 and its updates. When approving targets, the SPP Board of Directors has all the necessary information available to duly assess the sustainability aspects.

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

In line with the Sustainability Management Programme, SPP reports non-financial information and impacts, risks and opportunities related to SPP's activities by annually compiling the SPP Annual Report, which is subject to external verification by an independent auditor.

The organisational unit of SPP or SPP Group that has the information available is responsible for managing the impacts of SPP's activities and for reporting non-financial information in a specific area. Where reporting non-financial information and the impacts of SPP activities requires information shared by multiple organisational units, or where its acquisition requires cooperation between multiple organisational units, the management and reporting of information is coordinated by the Sustainability Manager.

The system for reporting and documenting material impacts, risks and opportunities related to SPP's activities and reporting non-financial

information is coordinated by the Sustainability Manager and SPP employees are required to provide him/her with necessary cooperation.

The procedure for compiling the draft SPP Annual Report and issues in the field of reporting information on sustainability, material non-financial impacts of the SPP Group, risks and opportunities related to the activities of the SPP Group, are discussed at the management meeting of SPP. The comprehensive monitoring of impacts, risks and opportunities is discussed at the meeting of the SPP Board of Directors which, at the same time, approves non-financial information on the impacts, risks and opportunities related to SPP's activities as part of the Annual Report.

In accordance with the Sustainability Management Programme, projects valued over €650 000, excluding VAT, are also subject to special assessment, in terms of:

- a) impact on the overall impacts of the SPP Group in the environmental, social and corporate governance areas, and
- b) whether they contribute to or threaten the implementation of the SPP Sustainability Strategy 2050 and any short-term, medium-term or long-term targets for achieving SPP's sustainability.

The project assessment is performed by the project proposer in cooperation with the Sustainability Manager. The result of project assessment is discussed separately by the management meeting of SPP and is approved by the SPP Board of Directors.

As part of project assessment, the project proposer also always submits an alternative project setup that pursues the same targets but does not worsen the overall environmental, social and corporate governance impacts of the SPP Group and does not jeopardise the implementation of the SPP Sustainability Strategy 2050 or any short-term, medium-term or long-term targets for achieving SPP's sustainability.

In 2024, the management bodies of the SPP Group dealt with all material sustainability topics relevant to the SPP Group on a cross-sectional basis.

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

With regard to the fact that SPP is a joint stock company wholly-owned by the state, the remuneration paid to members of the Board of Directors and the Supervisory Board of SPP is governed by the Remuneration Rules for Members of the Board of Directors and Supervisory Board of SPP, as approved by the Ministry of Economy of the Slovak Republic as the sole shareholder of SPP. These rules are in accordance with the Resolutions of the Government of the Slovak Republic No. 159/2011 and No. 190/2017.

The Remuneration Rules for Members of the Board of Directors and Supervisory Board of SPP do not take into account any sustainability incentives. Therefore, sustainability and climate aspects were not taken into account in 2024 in the remuneration paid to the Board of Directors and Supervisory Board of SPP and SPP CZ, or

to the managing directors of SPP CNG. More information on the remuneration of members of the Board of Directors and Supervisory Board of SPP and SPP CZ, as well as the managing directors of SPP CNG, is provided in section S1-10 Adequate wages.

In accordance with the Sustainability Management Programme and in the process of setting and evaluating targets within the performance evaluation system, each year the SPP Group also sets and evaluates targets for the achievement of SPP's sustainability. Company-wide targets and individual targets for senior employees in the field of achieving sustainability are linked to the ongoing reduction of the impacts of the SPP Group's activities on the surroundings and the implementation of the SPP Sustainability Strategy 2050, as well as the targets set therein.

In 2024, the share of targets in the field of achieving sustainability as part of company-wide targets set for all employees represented 20%. SPP's company-wide targets are set and evaluated by the SPP Board of Directors. In 2024, the senior employees of SPP, including the SPP CEO, SPP division directors, and SPP section directors, had a sustainability achievement target set with a weight of 10% also within their individual targets.

The individual goals for the SPP CEO are set and evaluated by the SPP Board of Directors. The individual targets for other senior SPP employees are set by their superior manager. Since 2024, the SPP Board of Directors has been setting ESG targets for SPP CZ and SPP CNG, which also include a sustainability achievement target with a weight of 2-8% depending on the position.

The sustainability achievement targets in 2024 were linked to material sustainability topics relevant to the SPP Group. The sustainability targets of the SPP CEO focused on overseeing implementation of the SPP Sustainability Strategy 2050, which centres on all topics that are significant for SPP. The directors of SPP divisions and directors of SPP sections had their targets in the field of sustainability achievement linked to sub-targets of the SPP Sustainability Strategy 2050 under the purview of their respective organisational unit.

GOV-4 Statement on due diligence

Comprehensive setting of the corporate governance and sustainability management system is a prerequisite for long-term success, maintaining trust among customers and business partners, and for the gradual reduction of the negative impacts of SPP's activities. The elements of SPP's due diligence aimed at identifying actual and potential negative impacts of SPP's activities on the environment, employees, and business partners, are included in the following parts of this statement:

- a) Incorporation of due diligence into management, strategy and the business model
 - ESRS 2 GOV-1, ESRS 2 GOV-2, ESRS 2 GOV-3, ESRS 2 SBM-1
- b) Involvement of affected stakeholders in all key due diligence steps
 - ESRS 2 SBM-2, ESRS 2 IRO-1, ESRS E1, ESRS E2, ESRS E3, ESRS E4, ESRS E5, ESRS S1, ESRS S3, ESRS S4, ESRS G1

- c) Identification and assessment of negative impacts
 - ESRS 2 SBM-3, ESRS 2 IRO-1
- d) Adoption of measures to address these negative impacts
 - ESRS E1, ESRS E2, ESRS E3, ESRS E4, ESRS E5
- e) Monitoring the effectiveness of these measures and communication
 - ESRS E1, ESRS E5, ESRS S1

GOV-5 Risk management and internal controls over sustainability reporting

SPP has created procedures and measures to protect the company against internal and external risks through its three-tier internal control system.

The basic component of SPP's control system consists of a system involving control mechanisms and measures that are implemented at the level of organisational units. These serve to mitigate the risks of individual processes or activities directly during their implementation.

Another component of SPP's control system consists of individual components of the internal control system. Specifically, these include risk management, personal data protection, security, and security policy (information and cyber security, physical and facility security, occupational health and safety), fire protection, environmental protection, protection from fraud by money laundering and other illegal activities, business continuity management, corporate governance, and the compliance program.

The third component of SPP's control system is the internal audit secured by the Audit and Revision Section, which provides the senior management, the Board of Directors and the Supervisory Board with independent reassurances as to what extent the functioning of the control system at the first and second level complies with the requirements of the Board of Directors and senior management.

In 2024, and in accordance with the Sustainability Management Programme, SPP prepared a general register of sustainability risks that shall be subject to regular assessment. The risks related to implementation of the SPP Sustainability Strategy 2050 and the targets set therein are also subject to regular assessment.

The scope of the risk assessment considers the risks in the environmental, social and corporate governance fields. In addition to general sustainability risks, the scope of risk assessment takes into account those risks arising from assessment of the dual materiality of the impacts of risks and opportunities related to the activities of the SPP Group, the reported impacts of the SPP Group within the individual topics covered by this statement, and the targets set out in the SPP Sustainability Strategy 2050 aimed at reducing the negative impacts of the activities of the SPP Group.

The management of risks in the field of sustainability management, including the form, scope and procedure as regards the assessment, monitoring and updating of risks and control mechanisms to mitigate risks in the field of sustainability management, and also risks related to the achievement of SPP's sustainability targets,

is conducted in accordance with SPP's internal risk management regulations.

Individual risks are regularly monitored and their assessment is submitted for discussion to the responsible SPP body along with proposed measures to eliminate the risk. As part of regular risk assessment, the current and expected risks and financial effects and opportunities associated with them are evaluated on a short-term, medium-term and long-term basis.

The Sustainability Management Programme establishes the obligation for senior employees of the SPP Group to identify risks to the achievement of sustainability targets within the scope of their managerial powers, and to inform the Sustainability Manager about them, along with proposed measures and tasks to eliminate them. At the same time, risk assessment is performed by senior employees of the SPP Group, or by individual internal risk owners, under the supervision of the Risk Management Section in accordance with SPP's internal risk management regulations.

The summary of risks in the field of sustainability management and targets set in the SPP Sustainability Strategy 2050, including proposed measures and specific tasks to eliminate them, is discussed twice a year at a management meeting of SPP. Subsequently, the comprehensive risk assessment is discussed at an SPP Board of Directors meeting twice a year. The SPP Board of Directors, as the supreme management body, approves the necessary measures and tasks to eliminate risks based on the submitted risk assessment.

SBM-1 Strategy, business model and value chain

SPP is the largest energy supplier in Slovakia. SPP supplies gas and electricity in a long-term, stable and reliable manner to approximately 1.5 million points of supply. SPP's customers include large industrial and energy companies, consumers from the commercial and public sector, and households. In 2024, SPP employed a total of 748 persons in the Slovak Republic. More information on how many people were employed by the SPP Group in 2024 and their breakdown is provided in Chapter 17, ESRS S1 Own Workforce.

Considering SPP's 165 years of history, the supply of natural gas continued to form a significant part of our business. As the largest gas supplier in the Slovak Republic and the gas supplier of last resort, SPP is responsible for ensuring a sufficient amount of gas for customers. The secure and stable supply of gas to customers is a priority for SPP.

SPP also supplies gas and electricity to customers in the Czech Republic through its subsidiary SPP CZ. Another subsidiary, SPP CNG, focuses on supplying CNG and LNG used in transportation. In 2024, SPP supplied the following amounts of energy to customers in Slovakia and Czechia:

In addition to the supply of gas and electricity, the company also provides other services to customers.

Through the Clean Electricity from SPP service, SPP provides customers with guarantees of electricity origin from RES. It includes a mechanism to support the construction of photovoltaic sources for local electricity generation from RES (PVPP) where a portion of each monthly payment is intended to support the development of PVPPs. Using the resources collected in this way, SPP will build PVPPs at selected schools, thanks to which these schools will use electricity from RES generated directly on site, thus saving their costs. The Clean Electricity from SPP service is used by tens of thousands of our customers.

Besides that, SPP provides the SPP Carbon Footprint service, the essence of which is to spread awareness about more sustainable

solutions (not only in the energy sector), motivate customers to lower their energy consumption and support community-benefit activities, such as planting trees in protected areas in Slovakia. More than one hundred thousand customers have been using the SPP Carbon Footprint service since 2020 and thanks to its customers, SPP has supported the planting of more than 1.9 million saplings in the protected forests of Slovakia.

Total consolidated revenues of the SPP Group were approximately €3480 million in 2024, coming primarily from the supply of gas and electricity and related activities, as well as from real estate rentals. The SPP Group does not have any significant revenues from other sectors than from gas and electricity supply and real estate rentals. Consolidated revenues of the SPP Group from gas supply and related activities amounted to approximately €2892 million in 2024 as per data provided in Note 22 of the Notes to the Consolidated Financial Statements of SPP.

Table 2 – Amounts of energy supplied to SPP Group customers

Energy type in MWh	Natural gas	Electricity*	Electricity with RES origin guarantees	Electricity with nuclear origin guarantees	Compressed natural gas (CNG)**	Compressed biomethane (bioCNG)**	Liquefied natural gas (LNG)	Liquefied biomethane (bioLNG)
SPP	30 863 908	7 715 765	411 815	112 855	-	-	-	-
SPP CNG	-	-	-	-	70 643	618	10 158	500
SPP CZ	5 122 666	190 071	9 612	123 000	-	-	-	-
Energy type in TJ	Natural gas	Electricity	Electricity with origin guarantees	Electricity with nuclear origin guarantees	Compressed natural gas (CNG)	Compressed biomethane (bioCNG)**	Liquefied natural gas (LNG)	Liquefied biomethane (bioLNG)
SPP	111 110	27 777	1 483	406	-	-	-	-
SPP CNG	-	-	-	-	254	2	37	2
SPP CZ	18 442	684	35	443	-	-	-	-

* From SPP's quantity in 2024, 1 877 322 MWh represented electricity supply to end customers; at the same time, we supplied 5 480 068 MWh to other household customers as part of extraordinary measures to protect households from extraordinary increases in market electricity prices.

** Adjusted based on the total amount of gas purchased for CNG production in MWh and the amount of CNG sold in kg (after deducting our own consumption).

For SPP, as a supplier of gas and electricity, key partners (along with customers) include suppliers of energy and services that are essential to ensuring energy supply.

SPP purchases gas via short-term and long-term gas supply contracts. Gazprom Export LLC remained the largest gas supplier in 2024. At the same time, in the interest of diversifying gas suppliers and strengthening energy security, SPP made use of gas supplies from non-Russian sources in 2024, based on contracts concluded with BP, ExxonMobil, Shell, ENI, and RWE.

SPP secures the supply of electricity via an exchange or via contracts signed with a major electricity producer in Slovakia. The company purchases electricity also via electricity purchase agreements, as a purchaser of electricity from RES and CHP. The activities as a purchaser of electricity from RES and CHP that SPP has been conducting since 2020 continued also in 2024. As part of them, SPP guarantees the purchase of electricity to thousands of small producers of electricity from RES.

To ensure the supply of gas and electricity to customers, SPP has concluded standardised contracts for access to gas distribution networks and electricity distribution systems with all relevant operators of these network services; in the case of electricity, also with the operator of the short-term electricity market in Slovakia.

The gas storage facility operator in Slovakia and the trading hubs serving the wholesale gas market in other EU countries in which SPP is active, are also important partners for SPP from the viewpoint of ensuring the security and stability of gas supply.

In addition to gas, electricity, and network services related to ensuring their delivery to customers, we also procure other goods, work and services. More information is provided in section ESRS G1-2 Management of relationships with suppliers.

Taking into account the total annual amount of gas and electricity supplied, the greenhouse gas emissions associated with the quantity of gas and electricity supplied to consumers account for SPP's most material impact, the reduction of which is the focus of the SPP Sustainability Strategy 2050 and the targets set therein.

The company has set the goals listed in the SPP Sustainability Strategy 2050 in a manner so that by taking gradual steps it reduces the impacts associated with the supply of gas and electricity, primarily by providing alternative solutions to its customers in the form of products and services without negative impacts.

SPP Sustainability Strategy 2050

SPP perceives sustainability as representing the overall impact of its activities and business on the environment, customers, employees, and society as a whole. Therefore, our efforts to ensure the sustainability of SPP's business and reduce the negative impacts of the company's activities forms an integral part of SPP's responsible business.

As a wholly state-owned company, SPP adheres to the Slovak Republic's commitment to achieving carbon neutrality by 2050. We are aware that targets concerning the climate and environmental protection issues are achievable only by reducing the consumption of all fossil fuels, including gas, and by consistent application of measures to

improve energy efficiency and the development of energy production from RES.

As the largest gas supplier in Slovakia and the gas supplier of last resort, we are responsible for securing a sufficient quantity of gas for customers. Ensuring secure and stable gas supplies to our customers therefore continues to be a priority for us for the future.

In addition to reliable gas supply, we also want to be able to offer alternative services to customers with an emphasis on sustainability. In SPP, we consider it our corporate responsibility when developing business to invest in our own energy production from RES, energy services, and products aimed at reducing energy consumption and greenhouse gas emissions.

In 2024, SPP therefore adopted the comprehensive SPP Sustainability Strategy 2050 document, by which the company set targets focusing not only on aspects of business and the development of energy efficiency services and producing energy from RES, but also on sustainable internal operation and other areas of responsible business in regards to:

1 Reducing impacts of SPP business activities

1.1 Long-term target by 2050

1.1.1 By 2050, to achieve a 100% reduction in total greenhouse gas emissions (net-zero, as concerns total emissions from SPP's activities compared to 2021).

1.2 Medium-term targets by 2030 and short-term targets by 2026

- 1.2.1 By 2030, to invest €500 million in the production of energy from RES (independently or in cooperation with partners); of which half will be invested in the production of energy from RES by 2027.
- 1.2.2 By 2030, to operate biomethane production facilities with an annual production of 200 GWh (independently or in cooperation with partners); half of which will be launched into operation by 2027.
- 1.2.3 By 2030, to operate sources for the production of electricity from RES with a total installed output of 200 MW (independently or in cooperation with partners); half of which will be put into operation by 2027.
- 1.2.4 By 2026, to operate a battery storage facility with a total installed capacity of 5 MW.
- 1.2.5 To increase the share of low-emission energy (electricity from RES and nuclear, gas from RES) in the total amount of energy supplied to end customers.
- 1.2.6 By 2026, to offer for sale a comprehensive range of technologies for local energy production and for supporting the use of electromobility for households.
- 1.2.7 To support education in the field of efficient energy use and activities aimed at environmental protection.
- 1.2.8 To develop alternatives in transport, including CNG and LNG in bus and freight transport, with a gradual transition to bioCNG/bioLNG and electromobility in passenger transport.
- 1.2.9 To support and promote legislative amendments that will facilitate

(i) development of the use of energy efficiency services and the growth of energy production from renewable sources with an emphasis on Slovakia's competitiveness, while maintaining and motivating new foreign investments and (ii) long-term support programmes for energy savings, enabling affordable and sustainable energy consumption by household consumers.

2 Reducing the impacts of SPP's internal processes

2.1 Long-term target by 2040

2.1.1 By 2040, to achieve a 100% reduction in greenhouse gas emissions arising from SPP's own consumption (net-zero, as concerns emissions from SPP's internal operation compared to 2021).

2.2 Medium-term and short-term targets by 2030 and 2026

2.2.1 By 2026, to operate sources for electricity production from RES with a total installed output of 1.5 MW for the internal needs of our own sites.

2.2.2 By 2026, to prepare a decarbonisation plan taking into account the cogeneration technology for electricity and heat production used at the SPP site in Bratislava with gradual replacement of natural gas with renewable gas or other available solution.

2.2.3 By 2026, to adopt a plan for the gradual comprehensive renovation of SPP buildings and to adjust internal processes so that, if reconstruction of any of the internal

heat sources is necessary, the sustainable technologies and the replacement of fossil heat sources with other technologies are conditionally included in the solution design. When replacing a heat source after 2026, to install a new condensing gas boiler with higher efficiency in exceptional cases only.

2.2.4 By 2026, to minimise paper consumption through the digitalisation of relevant processes (taking into account the legislative background).

2.2.5 To adopt measures continuously to reduce waste generation in SPP buildings.

2.2.6 To reduce greenhouse gas emissions from the use of company vehicles when replacing vehicles after 2027 and to support the introduction of measures for other transport forms than individual car transport.

3 Sustainability in SPP's corporate governance

3.1 Targets

3.1.1 To apply ethical principles and core values consistently to all parties in labour and business relationships in respect of corporate governance.

3.1.2 To align the Business Plan and the 5-year Strategic Plan with the targets set out in the SPP Sustainability Strategy 2050, upon their annual preparation or updating and to take into account the fulfilment of the SPP Sustainability Strategy 2050 in the variable remuneration component in SPP.

3.1.3 To ensure a high level of transparency and the provision of complete, unbiased, truthful, and clear information about its products and

services and the impacts of SPP's activities, both positive and negative, on customers and the public in all internal or external SPP communication.

3.1.4 By 2026, to introduce and evaluate sustainability standards also within the supply chain of SPP.

3.1.5 To prefer green procurement principles when procuring goods/services/construction work in SPP.

4 Employee care and support for diversity and inclusion in SPP

4.1 Targets

4.1.1 To maintain a high level of employee care in SPP.

4.1.2 To adopt measures in support of diversity and inclusion, promoting equal opportunities, and creating a safe working environment, aimed at achieving an inclusive environment supporting diversity among SPP employees and in relation to customers, also as part of SPP's internal and external communication.

4.1.3 By 2026, to increase the share of women holding middle and top management positions in SPP.

In order to implement the SPP Sustainability Strategy 2050, the company adopted the Sustainability Management Programme, which establishes the roles and responsibilities of SPP bodies and internal processes with the goal of implementing measures reducing the negative impacts of SPP.

Given the long-term nature of the SPP Sustainability Strategy 2050, the Sustainability Management Programme ensures its coherence and implementation of the measures and tasks set out in it through shorter-term strategic documents of SPP, specifically the annually adopted one-year Business Plan and the 5-year Strategic Plan of SPP.

The comprehensive transformation of the energy sector and the entire economy is necessary to reduce greenhouse gas emissions and other negative impacts associated with the supply of gas and electricity. This transformation will require significant investments into improving energy efficiency and developing transmission and distribution networks of electricity systems. Such a transformation is also associated with challenges in the transformation of the labour market and education.

Last but not least, the development of renewable energy projects is linked to specific challenges in the process of their preparation and implementation, namely the approval and setting up of a regulatory framework allowing their cost-efficient connection and operation. When transforming the energy sector, the impacts on socially disadvantaged groups of the population cannot be ignored, so that the goal of reducing greenhouse gases does not create or exacerbate the risk of poverty and social problems within society.

SBM-2 Interests and views of stakeholders

SPP's stakeholders comprise primarily SPP employees, the company's customers and business partners, the company shareholder, and other state and local government bodies. SPP uses communication with stakeholders also as feedback in the evaluation and adjustment of the business model and strategic direction of the company.

As a company operating in a competitive environment, information from stakeholders forms a vital part of being successful in doing business. This also applies to addressing impacts, risks, and opportunities within the framework of sustainability and the settings of the SPP Sustainability Strategy 2050, where account was taken of observations from developments in the labour market, customer behaviour, developments in the energy sector and the energy supply market, as well as the direction of legislation in the field of sustainability.

The involvement of stakeholders serves to understand and incorporate their interests not only in relation to the setting of the business model and strategic direction of SPP, but also in relation to the setting and understanding of SPP's material topics. The identification of material topics from the viewpoint of stakeholders helps SPP better understand their expectations, allows it to adapt better to changes and effectively manage any potential risks and opportunities.

Mutual dialogue and the opinions of stakeholders

are taken into account and evaluated in further procedures and decisions adopted by the SPP Group. Stakeholders were involved in the materiality assessment process by way of a questionnaire aimed at validating and receiving feedback on material topics of sustainability aspects identified in the dual materiality assessment process. More information on stakeholder engagement is provided in section ESRS IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities.

SPP has established working groups for sustainability and for promoting diversity and inclusion. Their purpose includes also promoting an active approach to achieving sustainability across the SPP Group and better sharing of information on measures and activities in sustainability management. The meetings of working groups are attended by people from key organisational units, as well as other active employees. Both groups meet regularly every 4 weeks.

SPP also informs employees about the latest activities in the field of sustainability through internal media – an employee magazine and intranet. At the same time, SPP regularly collects suggestions from employees through employee surveys.

The communication with almost 1.5 million SPP customers is dealt with through 20 SPP Customer Centres, the SPP Customer Line for households and the SPP Business Line for the corporate sector, as well as through regular surveys conducted several times a year. More information

is provided in the section ESRS S4 Consumers and end-users. With key customers, SPP ensures personal communication via the assigned sales representative. SPP provides additional information about its business and sustainability targets on request to key large business partners of SPP that are already assessing the sustainability of their own supply chain.

Throughout the year, SPP participates as a partner or speaker at conferences focused on the energy sector and its transformation, where it informs about its plans for the future and communicates with other participants. Membership in chambers of commerce, guilds and associations represents yet another form of dialogue with business partners, including other energy sector players, which SPP uses to familiarise itself with and get feedback on their views on sustainability. A list of them is given in section G1-5 Political influence and lobbying activities.

SPP regularly informs the Ministry of Economy of the Slovak Republic, as the company's shareholder, about its sustainability activities. The Ministry of Economy of the Slovak Republic is also the creator of legislation in the energy sector as a key area of SPP's business. The Ministry of Economy of the Slovak Republic approves the annual SPP Business Plan and the annually updated 5-year Strategic Plan of SPP. Under the Sustainability Management Programme, SPP ensures that both of these documents comply with the SPP Sustainability Strategy 2050.

SPP also regularly actively participates in the legislative process by proactively preparing proposals for legislative amendments or by

commenting on published draft legislation and strategic documents. The same applies to the regulatory framework in the energy sector, which is created by the Regulatory Office for Network Industries, or to legislation in other areas with an impact on SPP's business, such as environmental protection or the issuance of permits for new energy sources.

SPP takes the SPP Sustainability Strategy 2050 into account also in these activities, based on which it supports and promotes legislative amendments that will enable (i) promoting the use of energy efficiency services and a growth of energy production from renewable sources with an emphasis on Slovakia's competitiveness, while maintaining and motivating new foreign investments, and (ii) long-term support programs for energy savings, facilitating affordable and sustainable energy consumption by household consumers.

SPP creates room for intensive discussions and the involvement of local governments as stakeholders, especially in the preparation of our own projects for the production of energy from RES, such as wind power plants and biomethane production in EBWRCs. More information is provided in the section ESRS S3 Affected communities.

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

The impacts, opportunities, and risks in the field of SPP's sustainability result directly from its key activities of gas and electricity supply and its

position as the largest energy supplier in Slovakia. They also take into account the fact that SPP carries out its activities in open competition on the liberalised gas and electricity supply market within the single internal EU market. More information is provided in section SBM-1 Strategy, business model and value chain, namely in the section SPP Sustainability Strategy 2050.

This Sustainability Statement reflects the outcome of the assessment process of SPP's impacts, opportunities, and risks in the field of sustainability and the dual materiality assessment further described in section IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities.

Taking into account SPP's market position, the greatest number of material impacts, risks and opportunities related to SPP's activities has been identified in 'ESRS E1 Climate change' topic. As part of the assessment of impacts, risks and opportunities, SPP assessed its resilience to physical climate risks and the resilience of the SPP strategy and business model to transformation risks and opportunities related to climate change.

Physical climate risks are risks related to temperature, wind, water, and solid matter, being divided into chronic and acute risks. Climate change-related transformation risks and opportunities are those risks and opportunities that arise from the transition to a low-carbon economy resilient to climate change. These risks include political and legal risks, technological risks, market risks, and reputational risks.

SPP assessed the physical climate risks and transformation risks and opportunities related

to climate change based on internally available information, sustainability reports prepared in previous years, information from external sources, and information about the energy market and the state of competition. As part of assessment, SPP took into account time horizons broken down into short-term (1 year), medium-term (up to 5 years), and long-term (more than 5 years) horizons.

In its assessment, SPP took into account the information provided in the document "Review and Update to the National Climate Change Adaptation Strategy in Slovakia, Output 2.3: Assessment of Climate Risks and Vulnerability of Slovakia" ("Assessment of Climate Risks and Vulnerability of Slovakia")¹. According to the Assessment of Climate Risks and Vulnerability of Slovakia, the average temperature in Slovakia has increased since 1881 by approximately 2°C, with a significant increase in extreme maximum and minimum daily air temperatures registered particularly between 2001 and 2022, and with a sharp increase in the frequency of heat waves.

The Assessment of Climate Risks and Vulnerability of Slovakia also provides the assessment of optimistic and pessimistic scenarios for the near (2021-2050) and distant future (2071-2100), with the optimistic scenario taking into account the adoption of climate mitigation measures limiting global warming (RCP4.5) and the pessimistic scenario taking into account the situation without any mitigation measures (RCP8.5).

With both alternative scenarios, we may conclude that the trend of increasing temperatures will continue in the medium term and will be more significant in the long term with the increase in temperatures being higher in the RCP8.5 scenario

than in the RCP4.5 scenario. The Assessment of Climate Risks and Vulnerability of Slovakia also concludes the presence of other climate risks already today (extreme weather phenomena associated with high wind speeds and sudden intense precipitation, dry seasons, etc.), while they are expected to occur also in the future, with a more negative impact in the case of the RCP8.5 scenario than the RCP4.5 scenario.

This assessment did not take account of the impact on SPP's supply chain. Regarding the key activity of SPP (the supply of gas and electricity), it is essential that an assessment of physical climate risks and risks and opportunities related to climate change is also performed by operators of gas and electricity distribution infrastructure and, based on such an assessment, that they adopt appropriate adaptation measures. The Assessment of Climate Risks and Vulnerability of Slovakia identified one of the key risks as infrastructure and its disruption caused by extreme events.

The assessment took into account that SPP, as a gas and electricity supplier with predominantly administrative activities, is not an entity with significant operational requirements. SPP's position on the gas and electricity supply market was also taken into account, as well as the share of gas supply in SPP's total revenues and the activities already implemented in line with the SPP Sustainability Strategy 2050 in the past period, including future targets set therein.

Taking into account individual physical climate risks and the need to ensure the operation of buildings, the physical risks related to temperature already require the adoption of certain measures. Even with an optimistic scenario (given that we

have already witnessed an actual increase in the average temperature in Slovakia), the sector of buildings is among those significantly affected by the rising average temperature. In general, however, physical climate risks do not threaten the actual operability of SPP.

The risks and opportunities of transformation related to climate change can potentially affect SPP's business model in the medium and long term, as well as how SPP will be able to implement planned electricity and gas production projects from RES, and thus SPP's ability to increase their share in SPP's total revenues. It was precisely in the interest of minimising risks and taking advantage of transformation opportunities related to climate change that SPP adopted the key document SPP Sustainability Strategy 2050.

We will closely monitor, evaluate and update the assessment of climate change-related risks and opportunities in the coming years based on the success of implementing the targets set out in the SPP Sustainability Strategy 2050 and also on the basis of information published by other entities within the supply chain, including gas and electricity distribution infrastructure operators, as part of sustainability reporting.

Further material impacts, risks, and opportunities relate to the impacts of SPP's internal operation of real estates, its own workforce, affected communities, customer care, and corporate governance settings. A full list of them is provided below. Presently, SPP's sustainability impacts, opportunities and risks do not have a significant impact on the financial performance and cash flows of the SPP Group.

¹ <https://www.klima-adapt.sk/narodna-adaptacna-strategia>

ANI – Actual negative impact	PNI – Potential negative impact	
API – Actual positive impact	PPI – Potential positive impact	
R – Risk	O – Opportunity	
S – Short-term	M – Medium-term	L – Long-term

ESRS E1 Climate Change

Name/IRO	ESRS Sub-topic	Classification	Trigger	Description	Time horizon
Gas and electricity supply	Climate change adaptation	ANI	SPP has long been the largest supplier of gas and electricity in the Slovak Republic.	Negative impacts on stakeholders (especially customers) due to impacts within the supply chain (natural gas extraction and supply), as well as in the case of a non-increasing share of RES in total electricity supplied to customers.	S M L
Electricity production from RES	Climate change mitigation	PPI	SPP can have positive impacts on climate change mitigation through its own production and supply of energy from RES to the market.	The development of projects for our own electricity production, the promotion of construction of photovoltaic sources for local electricity production from RES (PVPP), the ongoing activities in purchasing electricity from RES and the supply of gas and electricity from RES (e.g. as part of the service Clean Electricity from SPP) can have a positive impact not only on the operation of the company itself, but also on customers, suppliers, and technology providers.	L
Reduction of energy consumption	Energy	PPI	Energy or material efficiency and a reduction of consumption, switching to another type of fuel, use of energy from renewable sources.	The emphasis on increasing investments aimed at improving energy efficiency and also on the development of energy production from renewable sources has a positive impact on public awareness and the transparency of SPP's activities.	M
Energy consumption	Climate change mitigation	O	Interest of customers in electricity from RES and reductions in energy consumption by customers.	The demand for services to reduce energy consumption and utilise local energy sources creates opportunities for new products and services (development of PVPPs, ESCO services).	M
Development of energy production from RES	Climate change mitigation	R	Interest of customers in electricity from RES and reductions in energy consumption by customers.	The demand for electricity from RES, as well as the diversification of sources and new technologies, requires greater resources for their implementation (human, financial, production), which may significantly increase costs. Long-term reduced energy consumption by customers due to the adaptation to climate change impacts and lower company revenues.	M

ESRS E2 Pollution

Name/IRO	ESRS Sub-topic	Classification	Trigger	Description	Time horizon
Own energy consumption (pollution)	Air pollution	ANI	Negative environmental impact by current operations that utilise fossil fuel resources.	The presently operated electricity and heat production sources are a source of pollutants; without replacing them and reducing energy consumption, the negative impact on the air will continue	M
Energy consumption (internal)	Air pollution	R	Costs associated with measures to reduce air pollution, investments in buildings, vehicle fleet, etc.	As part of reducing pollutant emissions, it is necessary to identify emission reduction tools and key action plans, including changes to the portfolio of products and services, as well as the adoption of new technologies for SPP. These activities may lead to higher costs.	M

ESRS E3 Water and marine resources

Name/IRO	ESRS Sub-topic	Classification	Trigger	Description	Time horizon
Water quality monitoring	Water	PPI	Informing the public about water quality, the impact on own water consumption and its reduction, activities for local communities through the foundation or other channels.	Based on contracts concluded with water plant operators, we perform regular water analyses, about which we regularly inform the public.	S

ESRS E4 Biodiversity and ecosystems

Name/IRO	ESRS Sub-topic	Classification	Trigger	Description	Time horizon
Impact on biodiversity	Direct impact drivers of biodiversity loss	PNI	Potential negative impact on the environment when constructing new energy production sources at locations where they could negatively affect biodiversity.	SPP should strictly comply with applicable legislation regulating processes that adequately ensure any construction of new energy production sources in locations where they could negatively impact biodiversity is prevented, as early as during the approval process.	L

ESRS E5 Circular Economy

Name/IRO	ESRS Sub-topic	Classification	Trigger	Description	Time horizon
Waste from internal operations	Resources inflows, including resource use	ANI	Supervision of waste generation within internal processes, its proper recovery or disposal.	Waste from internal activities is mainly generated in the operation of SPP's office premises. At the same time, SPP leases several properties and their operation requires regular reconstruction, generating a large amount of construction waste. Any waste should be minimised and, if generated, should be properly recovered or disposed of with the lowest possible impact on the environment – if not, waste constitutes a burden on the environment.	M
Development of biomethane production	Resource outflows related to products and services	O	Higher demand for renewable energy	The modernisation associated with the development of RES sources within EBWRC projects focusing on waste processing for biomethane production creates an opportunity for SPP, a.s. to strengthen its position and differentiate itself in a rapidly changing market.	M

ESRS S1 Own workforce

Name/IRO	ESRS Sub-topic	Classification	Trigger	Description	Time horizon
Working conditions	Working conditions	PPI	High employee turnover and absence rates may indicate underlying problems within the company that have an impact on operational performance, recruitment costs, training costs for new employees, and the impact on productivity during their time with the company.	SPP pursues activities to reduce employee turnover and create stable working conditions. One of these is the Collective Agreement, which applies to more than 90% of persons employed in SPP.	S
Diversity and inclusion	Equal treatment and opportunities for all	PPI	Gender equality and offering identical pay for identical work is an opportunity to attract and retain top talents.	Support for diversity and inclusion is part of the SPP Code of Conduct. This activity can positively influence internal relations and also create an opportunity to become an attractive employer.	S

ESRS S3 Affected communities

Name/IRO	ESRS Sub-topic	Classification	Trigger	Description	Time horizon
Human rights	Human rights Communities' civil and political rights	PPI	Respecting and promoting civil and political rights in communities can lead to the development of a positive and strong brand image, producing heightened interest of candidates in positions or generating support from the public at large. SPP supports civic initiatives through the SPP Foundation and Ekofond SPP.	SPP actively supports civil and political rights in communities through the SPP Foundation and Ekofond SPP. These activities have a positive impact on how we are perceived by consumers, investors and the public. This can lead to a better reputation and stronger company value, which in turn may contribute to customer loyalty and a competitive advantage.	S

ESRS S4 Consumers and end-users

Name/IRO	ESRS Sub-topic	Classification	Trigger	Description	Time horizon
Transparent communication	Personal safety of consumers and/or end-users	PPI	Ensuring customer safety is a legal and ethical obligation and is critical to maintaining the company's reputation, customer loyalty, and overall company success. In this sense, SPP secures the continuity of energy supplies to customers.	Transparency and clarity are key aspects when communicating about products and services offered by SPP to the public. The total number of points of supply, to which we supply electricity and gas, is approximately 1.5 million. In addition to that, our Clean Electricity from SPP and SPP Carbon Footprint services are used by more than 100 000 customers.	M

ESRS G1 Business conduct

Name/IRO	ESRS Sub-topic	Classification	Trigger	Description	Time horizon
Corporate governance	Corporate culture	PPI	Corporate culture influences an organisation's performance, reputation, risk management, and the ability to attract and retain talents.	The basic pillars of SPP's culture and principles of conduct are set out in the SPP Code of Conduct adopted by SPP in 2021. The SPP Code of Conduct stipulates that internal relations at all levels are based on the respect and dignity of every person. It also defines the basic principles of intolerance of discrimination and respect for fundamental human rights. The corporate culture and values include also support for diversity and inclusion.	S
Corporate governance	Corporate culture	O	Corporate culture influences an organisation's performance, reputation, risk management, and the ability to attract and retain talent, which may lead to higher operating costs.	Corporate culture can positively influence a company's financial performance. A positive culture that is aligned with the company's values and goals can lead to greater profitability, growth, and shareholder value.	M

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

SPP assessed the material topics for reporting using the so-called "dual materiality" principle. This means that when assessing which areas to cover in the report, we took into account not only the financial impact on the company, but also the company's impact on the environment and its surroundings. We assessed the topics at the level of ESRS standards that provide

a framework and disclosure requirements for individual material areas.

While accounting for the principles of dual materiality, we internally assessed individual material topics and assessed their financial impact, as well as SPP's impact on the environment and the surroundings. In particular,

we took into account topics related to SPP's key areas of activity, along with available non-financial information on the impacts of SPP's activities on the environment, employees, and the surroundings resulting from Sustainability Reports compiled for 2021 through 2023, which SPP prepared in line with the Global Reporting Initiative standards.

The sustainability materiality assessment process, which captures the material impacts of SPP on the environment and people, risks, and opportunities for SPP, took place in four stages – (1) Understanding, (2) Identification, (3) Assessment, and (4) Determination of material topics.

The first part included understanding and documenting the company’s business segments, business relationships and partners, including those located upstream (SPP as a customer) and downstream (SPP as a supplier), stakeholders, and resource dependencies aimed at identifying and assessing impacts, risks, and opportunities. When assessing impacts, we also took into account whether an impact was actual or potential.

Subsequently, the subsidiaries, countries, locations, or assets that were specifically considered through identification and assessment as part of the sustainability disclosures, were documented.

The identification of impacts included the company’s activities on both the supply and demand side of the chain, including products and services where actual and potential impacts were identified. The identification of risks and opportunities included risks and opportunities that affect (or can reasonably be expected to affect) the Company’s financial development, financial performance, cash flows, and access to funds.

Materiality assessment

The IRO assessment mechanism defined quantitative and/or qualitative materiality thresholds for identified impacts, risks and opportunities.

The impact materiality assessment was conducted based on the following factors:

- a) severity,
- b) scope,
- c) irreversibility (does not apply to positive impacts), and
- d) likelihood.

Each factor was assigned a value ranging from 0 to 5 and each value was qualitatively defined. The impact materiality threshold was set to 3.5. A total of 24 positive or negative impacts were assessed, of which 12 impacts exceeded the quantitative materiality threshold.

The materiality assessment of risks and opportunities was performed based on the following factors:

- a) likelihood, and
- b) scope of the potential financial effect.

Similarly as with impacts, each factor was assigned a value ranging from 0 to 5 and each value was qualitatively defined. The impact materiality threshold was set to 3.5. A total of 23 risks and opportunities were assessed, of which 5 risks and opportunities went over the quantitative materiality threshold.

Stakeholder engagement

The proposed material topics identified during internal discussions and after the internal assessment of impacts, risks and opportunities were subsequently validated by SPP with the most important stakeholders in the form of an online questionnaire where the topics were identified, as well as the determination of their materiality from the company’s perspective.

These stakeholders included our partners in public administration, the third sector, sectoral organisations, employee unions, as well as the largest customers.

IRO-2 Disclosure Requirements in ESRS covered by the undertaking’s sustainability statements

SPP set the impact materiality threshold in the

process of assessing material impacts, risks and opportunities at 3.5. More information is provided in ESRS IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities. Taking into account the materiality assessment of impacts, risks and opportunities related to SPP’s activities, this Sustainability Statement lists the following disclosure requirements and identifies requirements that are not material from the viewpoint of SPP’s activities:

Disclosure requirement		Page or explanation
ESRS 2 General Disclosures		23
BP-1	General basis for preparation of the sustainability statements	23
BP-2	Disclosures in relation to specific circumstances	23
GOV-1	The role of the administrative, management and supervisory bodies	24 – 27
GOV-2	Information provided to and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies	28
GOV-3	Integration of sustainability-related performance in incentive schemes	28
GOV-4	Statement on due diligence	29
GOV-5	Risk management and internal controls over sustainability reporting	29
SBM-1	Strategy, business model and value chain	29 – 32
SBM-2	Interests and views of stakeholders	33
SBM-3	Material impacts, risks and opportunities and their interaction with the strategy and business model	Pages 33 – 37, phasing-in transitional provision applied to a portion of expected impacts
IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	37 – 38
IRO-2	Disclosure requirements in ESRS covered by the undertaking’s sustainability statement	38 – 40

Disclosure requirement		Page or explanation
ESRS E1 Climate Change		48
E1-1	Transition plan for climate change mitigation	48 – 49
E1-2	Policies related to climate change mitigation and adaptation	49 – 50
E1-3	Actions and resources in relation to climate change policies	50
E1-4	Targets related to climate change mitigation and adaptation	51
E1-5	Energy consumption and mix	51 – 52
E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	53 – 56
E1-7	GHG removals and GHG mitigation projects financed through carbon credits	Not applicable to the SPP Group
E1-8	Internal carbon pricing is not material and is therefore not disclosed.	56
E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	Applied phasing-in transitional provision
Disclosure requirement		Page or explanation
ESRS E2 Pollution		56
E2-1	Policies related to pollution	56 – 57
E2-2	Actions and resources related to pollution	57
E2-3	Targets related to pollution	58
E2-4	Pollution of air, water and soil	58
E2-5	Substances of concern and substances of very high concern	58
E2-6	Anticipated financial effects from pollution-related, risks and opportunities	Applied phasing-in transitional provision

Disclosure requirement		Page or explanation
ESRS E3 Water and marine resources		59
E3-1	Policies related to water and marine resources	59
E3-2	Actions and resources related to water and marine resources	59 – 60
E3-3	Targets related to water and marine resources	60
E3-4	Water consumption	60
E3-5	Anticipated financial effects from water and marine resource risks and opportunities	Applied phasing-in transitional provision
Disclosure requirement		Page or explanation
ESRS E4 Biodiversity and ecosystems		61
E4-1	Transition plan and consideration of biodiversity and ecosystems in the strategy and business model	61
E4-2	Policies related to biodiversity and ecosystems	61 – 62
E4-3	Actions and resources related to biodiversity and ecosystems	62
E4-4	Targets related to biodiversity and ecosystems	Immaterial
E4-5	Impact metrics related to biodiversity and ecosystems change	Immaterial
E4-6	Anticipated financial effects from biodiversity and ecosystem-related risks and opportunities	Applied phasing-in transitional provision
Disclosure requirement		Page or explanation
ESRS E5 Resource use and circular economy		63
E5-1	Policies related to resource use and circular economy	63
E5-2	Actions and resources related to resource use and circular economy	63 – 64
E5-3	Targets related to resource use and circular economy	64
E5-4	Resource inflows	64
E5-5	Resource outflows	64 – 65
E5-6	Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities	Applied phasing-in transitional provision

Disclosure requirement		Page or explanation
ESRS S1 Own workforce		66
S1-1	Policies related to own workforce	66 – 67
S1-2	Processes for engaging with own workers and workers' representatives about impacts	67
S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	67 – 68
S1-4	Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and the effectiveness of those actions	68
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	68
S1-6	Characteristics of the undertaking's employees	69
S1-7	Characteristics of non-employee workers in the undertaking's own workforce	70
S1-8	Collective bargaining coverage and social dialogue	70
S1-9	Diversity metrics	71
S1-10	Adequate wages	71 – 72
S1-11	Social protection	72
S1-12	Persons with disabilities	72
S1-13	Training and skills development metrics	72 – 73
S1-14	Health and safety metrics	73
S1-15	Work-life balance metrics	73
S1-16	Remuneration metrics (pay gap and total remuneration)	73 – 74
S1-17	Incidents, complaints and severe human rights impacts	74
Disclosure requirement		Page or explanation
ESRS S3 Affected communities		74
S3-1	Policies related to affected communities	74 – 75
S3-2	Processes for engaging with affected communities about impacts	75
S3-3	Processes to remediate negative impacts and channels for affected communities to raise concerns	Immaterial
S3-4	Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	Immaterial

S3-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Immaterial
Disclosure requirement		Page or explanation
ESRS S4 Consumers and end-users		76
S4-1	Policies related to consumers and end-users	76
S4-2	Processes for engaging with consumers and end-users about impacts	76
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	76 – 77
S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	77 – 78
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	78
Disclosure requirement		Page or explanation
ESRS G1 Business conduct		79
G1-1	Corporate culture and business conduct policies and corporate culture	79
G1-2	Management of relationships with suppliers	79
G1-3	Prevention and detection of corruption and bribery	80
G1-4	Confirmed incidents of corruption or bribery	81
G1-5	Political influence and lobbying activities	81
G1-6	Payment practices	81

10.3 EU Taxonomy compliant reporting of sustainable investments

Information about the proportion of turnover, capital expenditures, and operating expenditures of SPP associated with Taxonomy-eligible or Taxonomy-aligned economic activities in 2024.

The information about the proportion of turnover, capital expenditures, and operating expenditures of SPP for the year ended 31 December 2024 describes the proportion of activities associated with Taxonomy-eligible economic activities under the first two environmental objectives (climate change mitigation and climate change adaptation) as per Article 8 of the EU Taxonomy.

Under the EU Taxonomy, an eligible economic activity (hereinafter "Taxonomy-eligible

economic activity") is an economic activity described in delegated acts supplementing the EU Taxonomy, regardless of whether the economic activity meets some or all technical screening criteria set out in these delegated acts.

The SPP Group assessed the activities implemented in 2024 and activities defined as Taxonomy-eligible economic activities, as defined and set out in the Climate Delegated Act² (Annex I – Climate Change Mitigation and Annex II – Climate Change Adaptation), the Supplemental Delegated Act³ as regards specific public disclosures for certain energy sectors, and in the Environmental Delegated Act⁴.

Based on this assessment, the SPP Group identified a match between the activities

Table 3 – Proportion of Taxonomy-eligible and Taxonomy-aligned activities in 2024 (turnover, capital expenditures, operating expenditures)

Year ended 31 st December 2024	Total (in € million)	Proportion of Taxonomy-eligible (non-aligned) economic activities (in%)	Proportion of Taxonomy-aligned economic activities (in%)	Proportion of Taxonomy-non-eligible economic activities (in%)
Turnover	3 479.98	0.27%	0.00%	99.73%
Capital expenditures	6.15	0.00%	10.84%	89.16%
Operating expenditures	4.35	30.75%	0.13%	69.13%

² Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to climate change mitigation or climate change adaptation and for determining whether that economic activity causes no significant harm to any of the other environmental objectives (the "Climate Delegated Act")

³ Commission Delegated Regulation (EU) 2022/1214 of 9 March 2022 amending Delegated Regulation (EU) 2021/2139 as regards economic activities in certain energy sectors and Delegated Regulation (EU) 2021/2178 as regards specific public disclosures for those economic activities (the "Supplemental Delegated Act")

⁴ Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to the sustainable use and protection of water and marine resources, to the transition to a circular economy, to pollution prevention and control, or to the protection and restoration of biodiversity and ecosystems and for determining whether that economic activity causes no significant harm to any of the other environmental objectives (the "Climate Delegated Act")

implemented in 2024 and activities that are eligible in relation to the environmental objective of climate change mitigation, summarised in Table 4 below.

An economic activity aligned with the EU Taxonomy (hereinafter "Taxonomy-aligned economic activity") refers to any activity that meets all of the following requirements under Article 3 of the EU Taxonomy:

- contributes substantially to one or more of the environmental objectives,
- does not significantly harm any of the environmental objectives,
- is carried out in compliance with minimum safeguards, and
- complies with technical screening criteria in

the Climate Delegated Act supplementing the EU Taxonomy regulation.

The SPP Group subsequently assessed the technical screening criteria for environmental objectives separately for each activity listed in Table 4 as defined in the Climate Delegated Act and the Supplementary Delegated Act and, where applicable, also the environmental objectives as defined in the Environmental Delegated Act. At the same time, it assessed compliance with minimum safeguards, the details of which are set out in point 2. The summary proportion of Taxonomy-eligible and Taxonomy-aligned economic activities in individual indicators of SPP is listed in Table 3. The activities listed in Table 4 below contribute to the turnover, capital expenditures, and operating expenditures of SPP.

Table 4 – Taxonomy-eligible economic activities of SPP

Economic activity	Description	Relevant to KPI	NACE code
4.1 Electricity generation using solar photovoltaic technology	Production of electricity using photovoltaic technology for consumption by SPP and for external customers.	Capital expenditures, Operating expenditures	35.11 42.22
4.3 Electricity generation from wind power	Construction or operation of electricity generation facilities that produce electricity from wind power for external customers.	Capital expenditures	35.11 42.22
4.30 High-efficiency co-generation of heat/cooling and power from fossil gaseous fuels	Operation of co-generation and tri-generation units for the combined production of electricity, heat and cooling for consumption by SPP and for external customers.	Turnover, Capital expenditures, Operating expenditures	35.11 35.30
6.5 Transport by motorbikes, passenger cars and commercial vehicles	Financial and leasing activities associated with the operation of SPP's vehicle fleet.	Operating expenditures	64 77.11
7.7 Acquisition and ownership of buildings	Purchase of real estate and exercising ownership of that real estate.	Turnover, Operating expenditures	68

In accordance with the technical assessment criteria for environmental objectives as defined by the Climate Delegated Act, the SPP Group assessed the activities 4.1 Electricity generation using solar photovoltaic technology and 4.3 Electricity generation from wind power as activities significantly contributing to climate change mitigation. This contribution lies in the nature of electricity production, using RES and available general data on the emission intensity of electricity produced in this way.⁵ With these two economic activities, the SPP Group also assessed whether or not they cause significant harm to any of the remaining environmental objectives.

As concerns activity involving the generation of electricity by solar photovoltaic technology – in the course of 2024 SPP made investments in facilities for generating electricity from solar photovoltaic technology. These facilities were built throughout Slovakia, primarily on the roofs of buildings (office buildings at SPP sites or school buildings under partnership projects with school operators) or in other locations on SPP estates in built-up municipal areas (SPP site in Michalovce). The equipment placed on the roofs of buildings should produce electricity for direct consumption at the place of production. The equipment at SPP sites can also be used to generate electricity for resale.

As concerns activity involving the generation of electricity from wind – in the course of 2024 SPP developed wind park projects to be located in Slovakia. All projects are subject to

the Environmental Impact Assessment (EIA) process and are at one of the EIA stages, in the preparation stage of environmental studies, or in the preparation stage of an application for EIA assessment. Wind power generation facilities should be used to generate electricity for the purpose of resale to end electricity customers under standard electricity supply contracts or through PPA contracts. No project has entered the implementation phase yet.

As part of analysing the technical criteria, SPP assessed projects for electricity generation using solar photovoltaic technology or wind power and their resilience to relevant climate risks, their impact in terms of the transition to a circular economy and the protection and restoration of biodiversity and ecosystems; the assessment concluded that these projects would not undermine any of the above targets.

1 Accounting policies of SPP

Key performance indicators include the turnover indicator, capital expenditures indicator, and operating expenditures indicator. The templates provided in Annex II to the Disclosures Delegated Act were used to present indicators for the purposes of EU Taxonomy.⁶ Considering the fact that the SPP Group also performs activities specified in the Supplemental Delegated Act, the applicable disclosures in Table 8 are provided in accordance with the said delegated regulation.

When preparing the disclosures, duplicate counting of items in turnover indicators, capital expenditures, and operating expenses under individual economic activities was prevented by setting up internal processes, including the exclusion of transactions between companies of the SPP Group.

1.1 Turnover

The proportion of Taxonomy-aligned economic activities in the total turnover of SPP was calculated as the proportion of net turnover from products and services associated with Taxonomy-aligned economic activities (numerator) to the total turnover from customer contracts (denominator) for the year ended 31 December 2024 in accordance with the data provided on page 6 of the Consolidated Financial Statements of SPP and in Note 22 to the Notes to Consolidated Financial Statements of SPP.

The Taxonomy-eligible economic activities defined for the energy sector include chiefly the production, installation, construction, and operation of facilities, while not including activities associated with electricity and gas supply. SPP generates a key portion of its turnover by supplying electricity and gas to end customers, which is a Taxonomy-non-eligible activity regardless of whether it involves the supply of electricity or gas from renewable sources. For this reason, the vast majority

of SPP's economic activities in 2024 cannot be classified as Taxonomy-eligible or even Taxonomy-aligned.

Taxonomy-eligible but Taxonomy-not-aligned economic activities generating turnover are activities 4.30 High-efficiency co-generation of heat/cool and power from fossil gaseous fuels and 7.7 Acquisition and ownership of buildings.

The year-on-year decline in the total turnover of the SPP Group was caused in 2024 by falling gas and electricity prices on the markets, reflected also in lower gas and electricity prices for customers and consequentially in lower revenues from gas and electricity supply contracts, which account for majority of the SPP Group's turnover. This situation also caused a year-on-year drop in turnover from activity 4.30 High-efficiency co-generation of heat/cool and power from fossil gaseous fuels. The lower turnover from activity 7.7 Acquisition and ownership of buildings, occurred mainly due to a time delay in the billing of high energy prices for 2022 during the course of 2023 and their decrease in the following period.

A quantitative breakdown of the turnover numerator is provided below. Within the numerator, SPP does not register any additional contracts with customers beyond the reported values.

Quantitative breakdown of the turnover numerator	€ million
4.30 High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	0.32
7.7 Acquisition and ownership of buildings	9.15
Total	9.47

⁵ Carbon Neutrality in the UNECE Region: Integrated Life-cycle Assessment of Electricity Sources, United Nation, 2022.

⁶ Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by specifying the content and presentation of information to be disclosed by undertakings subject to Articles 19a or 29a of Directive 2013/34/EU concerning environmentally sustainable economic activities, and specifying the methodology to comply with that disclosure obligation.

Table 5 - KPI related to turnover (turnover KPI)

Economic Activities	Code(s)	Total turnover EUR million	Proportion of turnover %	Substantial contribution criteria						Criteria relating to „Does Not Significantly Harm“ principle						Minimum Safeguards yes/no	Proportion of Taxonomy-aligned turnover Year N %	Proportion of Taxonomy-aligned turnover Year N-1 %	Category (enabling activity)	Category (transitional activity)
				(1) %	(2) %	(3) %	(4) %	(5) %	(6) %	(1) yes/no	(2) yes/no	(3) yes/no	(4) yes/no	(5) yes/no	(6) yes/no					
A. TAXONOMY-ELIGIBLE ACTIVITIES																				
A.1 Environmentally sustainable activities (Taxonomy-aligned)																				
Turnover from environmentally sustainable activities (Taxonomy-aligned) (A.1)		0.00	0.00%														0.00%	0.00%		
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																				
4. 30. High-efficiency co-generation of heat/cool and power from fossil gaseous fuels		35.11 35.30	0.32	0.01%	Not applicable Environmental objectives: (1) Climate change mitigation (2) Climate change adaptation (3) Water and marine resources (4) Pollution (5) Circular economy (6) Biodiversity and ecosystems												0.01%	0.01%		
77 Acquisition and ownership of buildings		68	9.15	0.26%													0.26%	0.20%		
Turnover from Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		9.47	0.27%	0.27%													0.21%			
Total turnover from Taxonomy-eligible activities (A.1 + A.2) (A)		9.47	0.27%	0.27%													0.21%			
B. TAXONOMY-NON-ELIGIBLE-ACTIVITIES																				
Turnover from Taxonomy-non-eligible activities (B)		3470.51	99.73%																	
Total (A+B)		3479.98	100.00%																	

1.2 Capital expenditures

The capital expenditures indicator was calculated as the proportion of capital expenditures associated with Taxonomy-aligned economic activities (numerator) to total capital expenditures as defined by the EU Taxonomy (denominator) for the year ended 31 December 2024.

The denominator comprises capital expenditures associated with investments in real estate and IT systems that form a major portion

of SPP's capital expenditures. Those are mostly additions to tangible and non-tangible assets recognised under the standards IAS 16 Property, Plant and Equipment, IAS 38 Intangible Assets, and IFRS 16 Leases. The numerator comprises the portion of capital expenditures associated with assets or processes related to Taxonomy-aligned economic activities.

Capital expenditures were determined in accordance with the data provided in Notes 8, 9 and 10, line 'Additions', column 'Total' in the Notes to the Consolidated Financial Statements of SPP.

In 2024, SPP continued implementing projects for the company's own small-scale local energy production from renewable sources. Specifically, this comprises the following projects:

- photovoltaic projects at selected elementary schools in Slovakia, to enable these schools to use electricity produced directly from RES and so reduce their current electricity costs by up to 30% on average,
- project for the photovoltaic power plant at the SPP site in Michalovce, which anticipates the generation and distribution of electricity to the public grid,

- preparatory stage of projects for the production of electricity from wind power, developed by SPP in Drahovce, Galanta, and Skalica, among others,
- project for the supply of heat and cooling to the polyfunctional complex Prístavná 1 (Energocentrum at SPP site in Bratislava).

The said capital expenditures form part of the plan for expanding the Taxonomy-aligned economic activities under the SPP Sustainability Strategy 2050. The planned investments to expand Taxonomy-aligned economic activities form part

Table 6 – Capital expenditures KPI

Economic Activities	Code(s)	Total CapEx EUR million	Proportion of CapEx %	Substantial contribution criteria						Criteria relating to „Does Not Significantly Harm“ principle						Minimum Safeguards yes/ no	Proportion of Taxonomy- aligned CapEx Year N %	Proportion of Taxonomy- aligned CapEx Year N-1 %	Category (enabling activity)	Category (transitional activity)
				(1) %	(2) %	(3) %	(4) %	(5) %	(6) %	(1) yes/ no	(2) yes/ no	(3) yes/ no	(4) yes/ no	(5) yes/ no	(6) yes/ no					
A. TAXONOMY-ELIGIBLE ACTIVITIES																				
A.1 Environmentally sustainable activities (Taxonomy-aligned)																				
4. 1. Electricity generation using solar photovoltaic technology	35.11 42.22	0.62	10.02%	10000%	000%					-	yes	-	yes	-	yes	yes	10.02%	6.90%	-	-
4. 3. Electricity generation from wind power	35.11 42.22	0.05	0.82%	10000%	000%												0.82%	0.45%		
CapEx from environmentally sustainable activities (Taxonomy-aligned) (A.1)		0.67	10.84%	10000%	000%					-	yes	-	yes	-	yes	yes	10.84%	7.35%	-	-
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																				
4. 30. High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	35.11 35.30	0.00	0.00%	Not applicable Environmental objectives: (1) Climate change mitigation (2) Climate change adaptation (3) Water and marine resources (4) Pollution (5) Circular economy (6) Biodiversity and ecosystems												0.00%	3.69%			
CapEx from Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		0.00	0.00%													0.00%	3.69%			
Total CapEx from Taxonomy-eligible activities (A.1 + A.2) (A)		0.67	10.84%													10.84%	11.04%			
B. TAXONOMY-NON-ELIGIBLE-ACTIVITIES																				
CapEx from Taxonomy-non-eligible activities (B)		5.48	89.16%																	
Total (A+B)		6.15	100.00%																	

of the 5-year Strategic Plan of SPP for the 2024-2028 period and the SPP Business Plan 2024, which are approved by the SPP Board of Directors and submitted to the shareholder of SPP.

The expansion of Taxonomy-aligned economic activities is primarily focused on investments

in projects for own electricity production from RES, especially on the long-term preparation and implementation of projects for electricity production from wind power (activity 4.3 Electricity production from wind power). The expected period of realisation of capital expenditures for expansion of

activity 4.3 Electricity production from wind power is five years. However, considering the high administrative complexity of processes for preparing and permitting wind power generation projects, their implementation may take longer under certain conditions.

The planned capital expenditures aimed at developing electricity production from wind power correspond to the target set in the SPP Sustainability Strategy 2050 to invest up to €500 million in the development of energy efficiency services and energy production from RES by 2030, with half of this by 2027. Total planned

capital expenditures in 2024 covered actual capital expenditures in 2024. There were no significant changes to the capital expenditures plan in 2024.

Completed or planned projects for local electricity sources from solar power and from wind power comprised a Taxonomy-aligned economic activity in 2024. These projects comply with the technical criteria laid down by the Climate Delegated Act, given their significant contribution to climate change mitigation and also considering how they cause no major harm to other objectives:

- climate change adaptation (projects are not threatened by physical climate risks from Appendix A to the Climate Delegated Act),
- transition to a circular economy (materials come from trustworthy manufacturers focusing on sustainability and recyclability), and
- protection of biodiversity (projects do not interfere with natural reserves and are mostly installed on the roofs of buildings).

SPP also moved forward with additional projects for the company's own generation of electricity and gas from renewable sources in accordance with targets adopted in the SPP Sustainability Strategy 2050. One of these projects includes the establishment of CEBZ, s.r.o. ("CEBZ"), a joint venture between SPP and the BRANTNER Group. CEBZ will continue developing energy and biological waste recovery centres based on the principle of a circular economy, which are to produce, inter alia, biomethane gained from biodegradable waste. These projects will be gradually put into operation in the coming years.

The year-on-year decrease in total capital expenditures of the SPP Group in 2024 was caused by the fact that more major development investments were implemented in 2023, such as the expansion of the CHP facility for electricity generation and supply of heat/cooling to the Prístavná 1 building in Bratislava.

For the same reason, there was also a year-on-year drop in capital expenditures for activity 4.30 High-efficiency co-generation of heat/

Quantitative breakdown of the numerator of capital expenditures to economic activities (in € million)

	Additions of real estate, machinery and equipment	Internally created intangible or acquired assets	Leases (capitalised assets with the right of use)	Total €
4.1 Electricity generation using solar photovoltaic technology	0.62	0	0	0.62
4.3 Electricity generation from wind power	0.05	0	0	0.05
TOTAL	0.67	0	0	0.67

cool and power from fossil gaseous fuels. The year-on-year reduction in capital expenditures for activity 4.1 Electricity generation using solar photovoltaic technology, was due to the fact that SPP implemented a PVPP in Michalovce in 2023 on a larger scale, while the price of technology declined as well. Capital expenditures for activity 4.3 Electricity generation from wind power did not change year-on-year.

1.3 Operating expenditures

The operating expenditures indicator was calculated as the proportion of operating expenditures associated with Taxonomy-aligned economic activities (numerator) to total operating expenditures as defined by the EU Taxonomy (denominator). The operating expenses under the EU Taxonomy include expenses associated with the maintenance and repair of buildings, machinery, equipment, and other direct expenditures related to everyday maintenance of buildings, machinery and equipment, with short-term lease and rental, and research and development. In the case of SPP, these operating expenditures mostly comprise expenditures associated with the maintenance of buildings and short-term lease expenses.

In the tables below, SPP did not include in operating expenditures under the EU Taxonomy those operating expenditures that are necessary to ensure the operation of SPP's assets, but which cannot be regarded as costs associated with maintenance under applicable accounting standards.

The numerator comprises a portion of SPP's operating expenditures associated with assets or processes related to Taxonomy-aligned economic activities, and forms part of the capital expenditures plan to expand Taxonomy-aligned economic activities. The projects for photovoltaic power plants that are completed or planned represent a Taxonomy-aligned economic activity. The numerator comprises limited operating expenditures associated with their implementation. Operating expenditures associated with rental and leasing of the vehicle fleet and the project for the supply of heat and cooling to the multi-functional building under construction at Prístavná 1 were classified as Taxonomy-eligible, yet Taxonomy-non-aligned economic activities.

Operating expenditures associated with the purchase of outputs of Taxonomy-aligned economic activities are likewise classified as Taxonomy-aligned operating expenditures. Given the shortage of publicly available information from suppliers in respect of the alignment of provided services with the EU Taxonomy, SPP does not report this type of operating expenditures. In the coming years, SPP will require the company's suppliers to provide information on whether their outputs represent a Taxonomy-aligned economic activity.

In 2024, total operating expenditures of the SPP Group did not change significantly year-on-year. This also applies to operating expenditures for activity 7.7 Acquisition and ownership of buildings. Year-on-year higher operating expenditures for activity 4.30 High-efficiency

Table 7 – Operating expenditures KPI

Economic Activities	Code(s)	Total OpEx EUR million	Proportion of OpEx %	Substantial contribution criteria						Criteria relating to „Does Not Significantly Harm“ principle						Minimum Safeguards yes/no	Proportion of taxonomy-aligned OpEx Year N %	Proportion of taxonomy-aligned OpEx Year N-1 %	Category (enabling activity)	Category	
				(1) %	(2) %	(3) %	(4) %	(5) %	(6) %	(1) yes/no	(2) yes/no	(3) yes/no	(4) yes/no	(5) yes/no	(6) yes/no						
A. TAXONOMY-ELIGIBLE ACTIVITIES																					
A.1 Environmentally sustainable activities (Taxonomy-aligned)																					
4. 1. Electricity generation using solar photovoltaic technology	35.11 42.22	0.005	0.13%	100.00%	0.00%							yes		yes		yes	yes	0.13%	0.08%		
OpEx from environmentally sustainable activities (Taxonomy-aligned) (A.1)		0.005	0.13%	100.00%	0.00%													0.13%	0.08%		
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																					
6. 5. Transport by motorbikes, passenger cars and commercial vehicles	64 77.11	0.37	8.44%	Not applicable Environmental objectives: (1) Climate change mitigation (2) Climate change adaptation (3) Water and marine resources (4) Pollution (5) Circular economy (6) Biodiversity and ecosystems												8.44%	5.99%				
7.7 Acquisition and ownership of buildings	68	0.66	15.17%													15.17%	11.93%				
4. 30. High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	35.11 35.30	0.31	7.14%													7.14%	3.54%				
OpEx from Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		1.34	30.75%													30.75%	21.46%				
Total OpEx from Taxonomy-eligible activities (A.1 + A.2) (A)		1.34	30.87%													30.87%	21.53%				
B. TAXONOMY-NON-ELIGIBLE-ACTIVITIES																					
OpEx from Taxonomy-non-eligible activities (B)		3.00	69.13%																		
Total (A+B)		4.35	100.00%																		

Table 8 - Proportion of nuclear and fossil gas related activities in turnover KPI, CapEx KPI and OpEx KPI

Economic Activities	Carried out by undertaking YES/NO	Amount and proportion							
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)		Amount	
		Amount (EUR million)	%	Amount (EUR million)	%	Amount (EUR million)	%	Amount (EUR million)	%
Nuclear and fossil gas related activities									
The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels									
Taxonomy-aligned economic activities (denominator)									
4. 30. High-efficiency co-generation of heat/cool and power from fossil gaseous fuels (proportion in the denominator of turnover KPI)	Not applicable	0.00	0.00%	0.00	0.00%	0.00	0.00%	Not applicable	
4. 30. High-efficiency co-generation of heat/cool and power from fossil gaseous fuels (proportion in the denominator of CapEx KPI)		0.00	0.00%	0.00	0.00%	0.00	0.00%		
4. 30. High-efficiency co-generation of heat/cool and power from fossil gaseous fuels (proportion in the denominator of OpEx KPI)		0.00	0.00%	0.00	0.00%	0.00	0.00%		
Total (amount and proportion in the denominator of turnover KPI)		0.00	0.00%	0.00	0.00%	0.00	0.00%		
Total (amount and proportion in the denominator of CapEx KPI)		0.00	0.00%	0.00	0.00%	0.00	0.00%		
Total (amount and proportion in the denominator of OpEx KPI)		0.00	0.00%	0.00	0.00%	0.00	0.00%		
Taxonomy-aligned economic activities (numerator)									
4. 30. High-efficiency co-generation of heat/cool and power from fossil gaseous fuels (proportion in the numerator of turnover KPI)	Not applicable	0.00	0.00%	0.00	0.00%	0.00	0.00%	Not applicable	
4. 30. High-efficiency co-generation of heat/cool and power from fossil gaseous fuels (proportion in the numerator of CapEx KPI)		0.00	0.00%	0.00	0.00%	0.00	0.00%		
4. 30. High-efficiency co-generation of heat/cool and power from fossil gaseous fuels (proportion in the numerator of OpEx KPI)		0.00	0.00%	0.00	0.00%	0.00	0.00%		
Total (amount and proportion in the numerator of turnover KPI)		0.00	0.00%	0.00	0.00%	0.00	0.00%		
Total (amount and proportion in the numerator of CapEx KPI)		0.00	0.00%	0.00	0.00%	0.00	0.00%		
Total (amount and proportion in the numerator of OpEx KPI)		0.00	0.00%	0.00	0.00%	0.00	0.00%		
Taxonomy-eligible but not taxonomy-aligned economic activities									
4. 30. High-efficiency co-generation of heat/cool and power from fossil gaseous fuels (proportion in the denominator of turnover KPI)	Not applicable	0.32	0.01%	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable
4. 30. High-efficiency co-generation of heat/cool and power from fossil gaseous fuels (proportion in the denominator of CapEx KPI)		0.00	0.00%						
4. 30. High-efficiency co-generation of heat/cool and power from fossil gaseous fuels (proportion in the denominator of OpEx KPI)		0.31	7.14%						
Total (amount and proportion in the denominator of turnover KPI)		0.32	0.01%						
Total (amount and proportion in the denominator of CapEx KPI)		0.00	0.00%						
Total (amount and proportion in the denominator of OpEx KPI)		0.31	7.14%						
Taxonomy non-eligible economic activities									
	none								

co-generation of heat/cool and power from fossil gaseous fuels, were caused by repairs of CHP facility (KGJ 3) in 2024.

The increase in operating expenditures for activity 6.5 Transport by motorbikes, passenger cars and commercial vehicles was due to a greater use of car rental services. The year-on-year increase in operating expenditures for activity 4.1 Electricity generation using solar photovoltaic technology relates to the fact that the number of facilities operated by SPP is increasing every year.

2 Minimum safeguards

The assessment of economic activities with respect to their alignment with the EU Taxonomy includes evaluation of compliance with minimum safeguards. Minimum social safeguards include those procedures aimed at ensuring economic activities take place in accordance with:

- OECD Guidelines for Multinational Enterprises (2011),⁷
- UN Guiding Principles on Business and Human Rights (UNGPR)⁸, including principles and rights established in the eight core conventions of the International Labour Organisation as set out in the Declaration on Fundamental Principles and Rights at Work⁹, and
- International Bill of Human Rights.¹⁰

The assessment of compliance with minimum social safeguards was performed for the following four areas:

1. Human rights (including labour and consumer rights)
2. Corruption and bribery
3. Taxation
4. Fair competition

In assessing compliance with minimum social safeguards, SPP followed a two-dimensional assessment approach. This means the company took into account the implementation of adequate procedures to prevent negative impacts, but also the scope of outputs used to monitor the outputs.

SPP understands the responsibility it bears from the position of the largest energy supplier in Slovakia and so in its daily business activities it not only declares, but also closely monitors, compliance with the principles of ethical behaviour that form part of the SPP Code of Conduct. Among others, the Code includes all four main areas of minimum social safeguards.

Quantitative breakdown of the operating expenditures numerator	€ million
Maintenance and repairs	0.97
Costs of short-term leasing and leasing of low-value assets	0.37
Other services	0.01
TOTAL	1.34

⁷ <https://www.oecd.org/daf/inv/mne/48004323.pdf>

⁸ https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

⁹ https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/normativeinstrument/wcms_716594.pdf

¹⁰ <https://www.ohchr.org/sites/default/files/Documents/Publications/Compilation1.1en.pdf>

10.4 ESRS E1 Climate Change

Identified risks and opportunities:

Energy consumption (customers) – O

The demand for services to reduce energy consumption and utilise local energy sources creates opportunities for new products and services (development of PVPPs, ESCO services).

RES development – R

The demand for electricity from RES, as well as the diversification of sources and new technologies, requires greater resources for their implementation (human, financial, production), which may significantly increase costs. Lower energy consumption by customers as a result of adaptation to climate change impacts may lower the company's turnover in the long term.

Identified impacts:

Gas and electricity supply – ANI

The supply of gas and electricity has a negative impact on climate change due to the combustion of fossil fuels, also as SPP has long been the largest supplier of gas and electricity in the Slovak Republic.

Electricity production from RES – PPI

The transition to renewable energy sources, such as solar or wind power, can have positive impacts on climate change mitigation through own production and the supply of energy from RES to the market.

Reduction of energy consumption – PPI

The emphasis on increasing investments aimed

at improving energy efficiency, and also on the development of energy production from renewable sources, has a positive impact on public awareness and on cutting consumption.

E1-1 Transition plan for climate change mitigation

In the interest of reducing negative impacts, the SPP Board of Directors adopted the SPP Sustainability Strategy 2050 focusing on climate change transformation measures, among other things. More information about the SPP Sustainability Strategy 2050 can be found in section ESRS 2 SBM-1 Strategy, business model and value chain.

The SPP Sustainability Strategy 2050 sets long-term targets for achieving carbon neutrality in emissions under Scope 1 and 2 by 2040 and total greenhouse gas emissions by 2050. At the same time, the SPP Sustainability Strategy 2050 sets specific short-term and medium-term goals for implementing measures to reduce greenhouse gas emissions by 2030.

The SPP Sustainability Strategy 2050 is not a transformation plan for climate change mitigation within the meaning of Directive (EU) 2024/1760 on corporate sustainability due diligence, as the SPP Group does not meet the minimum criteria for mandatory preparation of this plan as per the said directive. However, in the coming years the SPP Group will analyse the possible amendment and supplementing

of the SPP Sustainability Strategy 2050 in order to align it with the requirements of Directive (EU) 2024/1760 on corporate sustainability due diligence, including the target set in the Paris Climate Agreement to limit the global temperature rise to 1.5°C.

When performing the analysis, the SPP Group will take into account the updated Integrated National Energy and Climate Plan, which was not available during 2024 (finalised later in 2025), as well as the obligations arising from SPP's position as the supplier of last resort and other specific tasks entrusted to it as an entity with exclusive state ownership.

SPP plans to reduce greenhouse gas emissions through a combination of measures aimed at developing its own electricity production from RES, energy efficiency services, and the reduction of energy consumption, including services for local energy production by customers, together with the sale of technology directly to customers, as well as through higher sales of gas with guarantees of RES origin and sales of electricity with guarantees of RES and nuclear origin produced by other entities, and also by measures aimed at reducing emissions from internal consumption of energy, goods and services, which are set out in the SPP Sustainability Strategy 2050.

In accordance with the SPP 2050 Sustainability Strategy, SPP plans to invest €500 million by 2030, half of which is planned by 2027. These investments should focus primarily on the development of energy production from RES and can be spent on projects to be

implemented by SPP independently or through subsidiaries established in cooperation with other partners, similar to how the companies ESCO Slovensko or CEBZ already operate. When making investments, SPP makes sure that projects such as wind power generation meet the sustainable investment requirements set out by the EU Taxonomy.

The gradual implementation of the SPP Sustainability Strategy 2050 is also reflected in data reporting on sustainable investments in accordance with the EU Taxonomy in Chapter 11, within which the following activities are reported as eligible and aligned activities significantly contributing to climate change mitigation – 4.1 Electricity generation using solar photovoltaic technology with capital expenditures in 2024 on implemented facilities amounting to approximately €616 000 and 4.3 Electricity generation from wind power with capital expenditures in 2024 spent mainly on project parts as part of preparatory stages of wind farms in the amount of approximately €50 000.

SPP constructs facilities throughout Slovakia for generating electricity using solar photovoltaic technology, primarily on the roofs of buildings (office buildings at SPP sites or school buildings in partnership projects with school operators) or in other locations on SPP estates in built-up municipal areas (SPP site in Michalovce).

SPP is developing projects for the production of electricity from wind power with a planned output of over 460 MW in eight locations in Slovakia (Drahovce, Skalica, Galanta, Nové

Zámky, and others). All projects are subject to the Environmental Impact Assessment (EIA) process and are at various stages of the EIA, the stage of compiling environmental studies or at the stage of preparing the application for EIA assessment.

Taking into account SPP's business model and activities focused on the supply of gas and electricity, the company considers the potential for locked-in greenhouse gas emissions from key assets to be negligible and does not expect them to jeopardise the achievement of target values related to greenhouse gas emission reductions.

In 2024, SPP did not spend any significant CapEx amounts on economic activities related to coal, oil or gas. SPP only spent €25 659 of CapEx on the supply, manufacture and installation of technology parts for CNG and LNG stations in 2024.

By itself or through its subsidiaries, SPP achieved the following progress in 2024 in implementing the SPP Sustainability Strategy 2050:

- The share of electricity supplied from RES in the total electricity supply to end customers came to 22%.
- SPP operated a PVPP in Michalovce producing an output of 628 kWp in 2024. Along with smaller PVPPs on the roofs of buildings in Bratislava and Košice, the company produced 476 MWh of electricity from RES in 2024, using its internal sources.
- In 2024, SPP also organised the procurement of the contractor for the planned battery

storage facility with a capacity of 4 MW, which should be located at the SPP site in Spišská Belá, with its implementation and commission expected in 2025.

- The company initiated the development of eight wind park projects in 2024, with a planned output of more than 460 MW. These projects are either at the final environmental impacts report stage, the environmental studies stage, or right before submission of the impact assessment application.
- In 2024, ESCO Slovensko implemented PVPPs for its customers with a total output of 3 MWp and prepared an additional 3 MWp for implementation.
- As part of the Energy and Biological Waste Recovery Centre (EBWRC) projects and together with its partner – BRANTNER, in 2024 SPP launched the optical sorting line into operation as the first stage of EBRWC Nové Zámky.
- As part of the Clean Electricity from SPP service, by which customers also contribute to the construction of PVPPs at schools, SPP set up local PVPPs in 20 schools in 2023 and 2024 with a total output of 478 kWp (of which 14 in 2024).
- As part of the SPP Carbon Footprint service, which aims to motivate customers to cut energy consumption and also lets them contribute to the planting of trees in protected areas of Slovakia, SPP has planted more than 1.9 million new trees since 2020 (of which 688 000 in 2024).

E1-2 Policies related to climate change mitigation and adaptation

The basic policy of SPP in the field of sustainability, including climate change mitigation and adaptation, is the Sustainability Management Programme adopted by the SPP Board of Directors as part of the basic documentation of the company.

The Sustainability Management Programme establishes internal processes that should be aimed at implementing measures to reduce the negative impacts of SPP and, ultimately, achieving sustainability, based on identification of the impacts of SPP's activities, setting targets to reduce negative impacts, and oversight of the implementation of set targets, including sustainability risks.

The aim of the Sustainability Management Programme is, among other things, to ensure the implementation of the SPP Sustainability Strategy 2050 and targets set out therein. Given the long-term nature of the SPP Sustainability Strategy 2050, the Sustainability Management Programme ensures its coherence and implementation of measures and tasks set out in it through shorter-term strategic documents of SPP, specifically the annual Business Plan and the Strategic Plan of SPP adopted for a 5-year period.

As part of the basic documentation, the Sustainability Management Programme is binding for SPP and its wholly-owned subsidiaries.

The Sustainability Management Programme governs the processes for overseeing SPP's impacts, the achievement of targets set out in the SPP Sustainability Strategy 2050, as well as sustainability risks. Therefore, the Sustainability Management Programme is a general regulation that also governs SPP's policies in the fields of climate change mitigation, adaptation to climate change, energy efficiency, and the introduction of RES, as well as other topics set out in the SPP Sustainability Strategy 2050. More information on the Sustainability Management Programme is found in section GOV-1 The role of the administrative, management and supervisory bodies.

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

As part of the implementation of the SPP Sustainability Strategy 2050, the company takes specific measures in the field of climate change, aimed primarily at enhancing energy efficiency and developing projects for power generation from RES. The expected contribution of measures implemented in 2024 or projects under preparation to reduce greenhouse gas emissions is as follows:

1. The sale of electricity with RES and nuclear origin guarantees brought annual savings of 268 790 tonnes of CO₂e in 2024.

Electricity production, the consumption of which is covered by RES and nuclear origin guarantees, has a significantly lower

emission intensity than electricity from the residual energy mix (i.e. electricity without guarantees of origin). SPP supplies households with electricity produced in Slovakia with RES origin guarantees. SPP supplies electricity with RES or nuclear origin guarantees to customers from the commercial sector, depending on the customer's choice.

2. The expected annual electricity production from implemented PVPP projects in 2023 and 2024 with an output of 7.234 MW (approximately 7.23 GWh) brings annual savings of 2 300 tonnes of CO₂e.

The same applies to locally produced and consumed electricity from PVPPs – electricity produced from solar energy has a significantly lower emission intensity than electricity from the residual energy mix. In the reporting period, SPP implemented and operated PVPPs at its own sites while also implementing 20 PVPPs at schools in Slovakia in 2023 and 2024 as part of the service Clean Electricity from SPP.

Moreover, ESCO Slovensko implemented PVPPs for its customers located primarily on customer buildings, parking lots, polluted land lots or in so-called brownfields, thus preserving agricultural land.

3. The expected annual electricity production of 500 GWh from the planned 200 MW wind power projects is to produce annual savings of 170 780 tonnes of CO₂e.

4. The expected annual biomethane production of 200 GWh by the planned projects is to generate annual savings of 40 400 tonnes of CO₂e.

The production of electricity by the planned wind power plant projects, the emission intensity of which is also significantly lower than electricity from the residual energy mix, is expected to contribute significantly to reducing impacts. The anticipated date of putting wind power generation projects into operation is 2027.

SPP also expects the upcoming EBWRC projects to significantly influence its impacts from biomethane production due to the lower emission intensity of biomethane compared to natural gas. EBWRC projects are also anticipated to be launched into operation in 2027.

When calculating the benefit, the emission factors of electricity from the residual energy mix in the Slovak Republic in 2023 of 357.56 g CO₂e/kWh and the emission factors of electricity from other sources were taken into account at the upper limit of the following range:¹¹

- Electricity from nuclear sources: 5.1 – 6.4 g CO₂e/kWh,
- Electricity from hydro power with a 360 MW output: 6.1 – 11 g CO₂e/kWh
- Electricity from onshore wind power: 7.8 – 16 g CO₂e/kWh,
- Electricity from solar power: 8 – 82 g CO₂e/kWh (in Europe, emission intensity is approximately 37 g CO₂e/kWh).

¹¹ Carbon Neutrality in the UNECE Region: Integrated Life-cycle Assessment of Electricity Sources, United Nations, 2022; general data are used as sources since no such data are available from electricity producers in Slovakia.

A key factor influencing the reduction of greenhouse gas emissions from SPP activities will be the setting of the regulatory framework, which may increase, but also fundamentally limit, the motivation of other entities operating in network industries and gas/electricity consumers to take measures supporting the introduction of solutions leading to the reduction of greenhouse gas emissions.

E1-4 Targets related to climate change mitigation and adaptation

To achieve carbon neutrality of the SPP Group, we consider it crucial to reduce emissions particularly in electricity and gas supplies to our customers. Therefore, we continue to consider it a priority to prepare projects for our customers to improve energy efficiency and produce energy from RES, which we consider to be the most important measure to reduce SPP's carbon footprint.

Our goal is to achieve a 100% reduction in total greenhouse gas emissions (Scope 1, 2 and 3) by 2050 at the latest (net-zero in terms of total emissions from SPP's activities compared to 2021) so that our emissions are in line with the global warming limit of 1.5°C as per the Paris Agreement.

At the same time, our goal is to achieve a 100% reduction in total greenhouse gas emissions from SPP's internal operations (Scope 1 and 2) by 2040 at the latest (net-zero, as concerns total emissions from internal operations compared to 2021).

Both commitments relating to a reduction of greenhouse gas emissions apply to 2021 as they were adopted in 2022 as part of the introduction of corporate governance in the field of achieving sustainability and in reference to the preparation of SPP's first sustainability report for 2021, which also included the calculation of greenhouse gas emissions related to the activities of the SPP Group. We shall regularly review them in the coming years with the aim to reduce greenhouse gas emissions from SPP activities as soon as possible.

As concerns climate change, SPP opted to adopt targets for the development of energy production from RES by 2030 instead of a target to reduce greenhouse gas emissions by 2030 in the form of an absolute value or portion of current emissions, on the following grounds:

1. Greenhouse gas emissions from SPP's internal operation (Scope 1 and 2) are mainly influenced by gas consumption for the production of electricity and heat for internal consumption in SPP's buildings. In recent years, SPP has greatly reduced its internal gas consumption, with consumption in 2024 (35 485 MWh) being approximately 45% lower than in 2010 (65 464 MWh).
2. Greenhouse gas emissions from SPP's activities are mainly influenced by the total amount of gas and electricity sold to customers. SPP has significantly reduced the total amount of sold gas in recent years with supplied gas in 2024 (36 TWh) being approximately 35% lower than in 2010 (55.4 TWh).

3. Greenhouse gas emissions from SPP's activities in 2024 are also significantly affected by the amount of electricity supplied to other suppliers in connection with special obligations (provision of electricity at preferential prices for households), comprising approximately 5.5 TWh of electricity, accompanied by roughly 2 million tonnes of associated greenhouse gas emissions. As the specific obligations of SPP related to the provision of electricity to other suppliers at preferential prices for households will not continue, total greenhouse gas emissions will decrease in the coming years by a significant amount of 2 million tonnes.
4. SPP also adopted the SPP Sustainability Strategy 2050, in which it set targets for the development of energy from RES, specifically to operate electricity production sources from RES with an output of 200 MW by 2030. To achieve this target, we are developing wind farm projects. The expected electricity production from the 200 MW wind power plants is 500 GWh. The SPP Sustainability Strategy 2050 also includes other targets for energy production from RES. Electricity produced in this way will have a proportionate impact on the intensity of greenhouse gas emissions per unit of electricity produced by our own sources reported in Scope 1.
5. At the same time, however, considering SPP's exceptional position on the gas and electricity supply market, we cannot rule out that the company will be entrusted with additional special obligations in future, e.g. in the field of gas supply security and

special measures to ensure reasonable gas and electricity prices for selected segments. The consequence of these obligations may come as an increase in the total amount of gas and electricity supplied and consequentially also an increase in total greenhouse gas emissions.

More information on progress in the implementation of measures under climate change targets is provided in sections ESRS E1 - Climate Change and E1-2 Policies related to climate change mitigation and adaptation.

E1-5 Energy consumption and mix

Efficient energy use and energy savings are an important part of efficient internal operation at SPP. We monitor and assess our internal energy consumption. In 2024, we continued implementing measures in our office premises that were introduced in previous years, including reduced heating mode at night, weekends and national holidays, dimming interior lights and turning off exterior lights at night. At the same time, we utilised other measures introduced in past years, such as working from home. Thanks to these measures, but also thanks to warmer weather, SPP's internal electricity consumption once again decreased year-on-year.

At the SPP site in Mlynské nivy (Bratislava), we operate a high-efficiency combined heat and power (CHP) plant with an output of 2.362 MW of electrical power and 3.35 MW of heating power, providing a total production of 9.13 GWh of electricity and 11.5 GWh of heat. Total

electricity and heat production declined compared to 2023 (10.24 GWh of electricity and 13.32 GWh of heat) due to the adopted saving measures. The energy production source at the CHP plant is natural gas and its efficiency reached 78.43% in 2024.

The CHP plant is intended for the production of heat and electricity, primarily for buildings owned by SPP. We also use the heat produced in the CHP plant to produce cooling for air-conditioning of these premises. We consume any excess electricity not consumed at the SPP site in Bratislava in other sites across Slovakia or supply it to other end customers through the distribution system, while we supply a portion of heat produced by our CHP plant to external customers.

We also own and operate several dozen smaller buildings and premises throughout Slovakia that use different technologies as a source of heat, mainly natural gas (SPP uses diesel generators for backup power). Some heating sources are over 15 to 20 years old and their operating condition is ensured by high-quality regular servicing. Gas consumption at the CHP plant accounts for approximately 82% of SPP's total direct internal gas consumption.

In 2024, we operated smaller PVPPs on the roofs of buildings at SPP's sites in Košice with an output of 28 kWp and in Bratislava with an output of 99.9 kWp combined with a 135 kVA battery. In June 2024, the new PVPP in Michalovce was put into operation with an output of 628 kWp. By the end of 2024, these sources produced 476 MWh of electricity.

We purchase electricity, heat or cooling from an external supplier only indirectly, namely for the needs of premises that we rent from third parties, mainly SPP Customer Centres. The internal energy consumption of the SPP Group was as follows in 2024:

Table 9 – Internal electricity, gas, heat, and fuel consumption of the SPP Group in 2024*

MWh	Diesel**	Electricity***	Gas	(of which sold heat)	Heat	Total
SPP	38	7 017	35 485	- 541	-	41 999
SPP CNG	-	1 484	2 711	-	41	4 236
SPP CZ	-	34	-	-	29	63
GJ	Diesel**	Electricity***	Gas	(of which sold heat)	Heat	Total
SPP	136	25 261	127 746	- 1 948	-	151 195
SPP CNG	-	5 342	9 758	-	149	15 249
SPP CZ	-	122	-	-	104	226

* Internal consumption of coal and coal products of the SPP Group is 0 and internal consumption of fuels from other fossil sources of the SPP Group is also 0.

** Internal consumption of crude oil and petroleum products of the SPP Group is included in the data on diesel consumption and the fuel consumption in transport is provided in Table 12.

*** Internal electricity consumption of SPP and SPP CNG is produced from gas, the consumption of which is also included in the internal gas consumption of the SPP Group.

The energy intensity of the SPP Group is shown in the table below. When converting energy intensity into net income, the consolidated revenues of the SPP Group were applied, consisting of revenues from the supply of gas and electricity and related activities, and from real estate rentals as areas with a large climate impact (page 6 of the Consolidated Financial Statements of SPP and Note 22 to the Notes to the Consolidated Financial Statements of SPP). For comparison, we also provide information on energy intensity converted into operating profit of the SPP Group (i.e. excluding income from dividends).

Table 10 – Energy intensity of the SPP Group based on revenues and operating profit in 2024

Total internal consumption in MWh (sum from Table 9)	Turnover (consolidated) (in € million)	Operating profit (consolidated) (in € million)	Energy intensity based on turnover (in MWh/€ million)	Energy intensity based on operating profit (in MWh/€ thsnd)
46 298	3 480	164	13.304	0.282

Table 11 – Own electricity production in 2024

Own electricity production in MWh (source: gas)	Own electricity production in MWh (source: PVPP)	Total own electricity production in MWh
9 134	476	9 610

The above data show the internal consumption in accordance with ESRS and do not include internal fuel consumption in transport. As an operator of alternative fuel CNG and LNG filling stations, we also use this fuel for our internal needs. At the same time, we are working on developing charging infrastructure for electromobility. At the end of 2024, SPP operated a total of 13 charging points for electric vehicles at SPP buildings in Bratislava, Zvolen, Košice and Michalovce (of which 8 are AC charging points and 5 DC charging points). In 2024, the SPP Group had the following fuel consumption in transport:

Table 12 – Internal fuel consumption in transport of the SPP Group in 2024

	Diesel (l)	Petrol (l)	CNG (kg)	GJ	Diesel*	Petrol**	CNG***
SPP	42 964	117 745	11 745	SPP	1 547	3 768	530
SPP CNG	-	450	12 756	SPP CNG	-	14	575
SPP CZ	17 466	3 744	746	SPP CZ	629	120	34
Total	60 430	121 939	25 247		2 176	3 902	1 139

* The energy content value based on volume (lower calorific value) for diesel is 36 MJ/l as per Decree No. 271/2011 Coll. establishing sustainability criteria and targets for reducing greenhouse gas emissions from fuels.

** The energy content value based on volume (lower calorific value) for petrol is 32 MJ/l as per Decree No. 271/2011 Coll. establishing sustainability criteria and targets for reducing greenhouse gas emissions from fuels.

*** The energy content value based on weight (lower calorific value) for CNG and LNG is 45.1 MJ/kg as per Decree No. 271/2011 Coll. establishing sustainability criteria and targets for reducing greenhouse gas emissions from fuels.

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

Table 13 – Gross Scopes 1, 2, 3 and Total GHG emissions

Retrospectively

	2025	Porovnanie	2024	% N/N-1	Annual % target/base year
GHG emissions in Scope 1					
Gross GHG emissions in Scope 1 (tCO ₂ e)	N/A	N/A	8 306	N/A	N/A
Scope 1 percentage					
Greenhouse gas emissions from regulated emissions trading (in %)	N/A	N/A	0	N/A	N/A
GHG emissions in Scope 2					
Gross GHG emissions in Scope 2 (location-based in tCO ₂ e)	N/A	N/A	195	N/A	N/A
Gross GHG emissions in Scope 2 (market-based in tCO ₂ e)	N/A	N/A	523	N/A	N/A
Significant GHG emissions in Scope 3					
Total gross indirect GHG emissions (Scope 3 location-based in tCO ₂ e)	N/A	N/A	9 690 613	N/A	N/A
Total gross indirect GHG emissions (Scope 3 market-based in tCO ₂ e)	N/A	N/A	11 240 509	N/A	N/A
1. Purchased goods and services	N/A	N/A	N/A	N/A	N/A
Optional sub-category: Cloud computing and data centre services	N/A	N/A	N/A	N/A	N/A
2. Capital goods	N/A	N/A	N/A	N/A	N/A
3. Activities related to fuel and energy (location-based in tCO ₂ e) (not included in Scope 1 or Scope 2)	N/A	N/A	2 409 529	N/A	N/A
Activities related to fuel and energy (market-based in tCO ₂ e) (not included in Scope 1 or Scope 2)	N/A	N/A	3 959 424	N/A	N/A
4. Transportation and distribution to suppliers	N/A	N/A	N/A	N/A	N/A
5. Waste generated within the scope of the activities	N/A	N/A	N/A	N/A	N/A
6. Business trips	N/A	N/A	N/A	N/A	N/A
7. Commuting by employees	N/A	N/A	N/A	N/A	N/A
8. Assets provided to suppliers through leasing	N/A	N/A	N/A	N/A	N/A
9. Transportation to customers	N/A	N/A	N/A	N/A	N/A
10. Processing of sold products	N/A	N/A	N/A	N/A	N/A
11. Use of sold products	N/A	N/A	7 281 085	N/A	N/A
12. Handling of sold products at the end of their life	N/A	N/A	N/A	N/A	N/A
13. Assets provided to customers through leasing	N/A	N/A	N/A	N/A	N/A
14. Franchising licenses	N/A	N/A	N/A	N/A	N/A
15. Investments	N/A	N/A	N/A	N/A	N/A
Total greenhouse gas emissions					
Total GHG emissions (location-based in tCO ₂ e)	N/A	N/A	9 699 115	N/A	N/A
Total GHG emissions (market-based in tCO ₂ e)	N/A	N/A	11 249 338	N/A	N/A

Greenhouse gas emissions within the GHG Protocol take into account seven greenhouse gases – carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons¹² (HFC), perfluorocarbons (PFC), sulphur hexafluoride (SF₆), and nitrogen trifluoride (NF₃). Emissions of individual greenhouse gases can be expressed as CO₂ equivalents (hereinafter the “CO₂e”). Global warming potential indicates to what extent greenhouse gases influence global warming over a certain period compared to CO₂.

In the calculation, the values of “Global warming potential” for a 100-year horizon were used, based on the sixth report of the International Panel on Climate Change (IPCC). The sources of all emission factors used in the calculation of greenhouse gas emissions are available in Table 14.

Reported greenhouse gas emissions include SPP, SPP CZ and SPP CNG, i.e. companies under SPP’s operational control. The largest amount of greenhouse gas emissions related to

Table 14 – Source of emission factors for individual SPP emissions (Emission factors are given in units as stated in the sources)

Fuel type	Unit	Emission factor 2024
Natural gas in Slovakia	t CO ₂ /TJ	56.17
Natural gas for Czechia	t CO ₂ /TJ	55.51
R410A air conditioning fluid	t CO ₂ e/t	2 088
Electricity produced in Slovakia (electricity production energy mix)	g CO ₂ /kWh	123.04
Electricity supplied in Slovakia (residual supplier mix)	g CO ₂ /kWh	357.56
Electricity produced in Czechia (electricity production energy mix)	g CO ₂ /kWh	577.92
Electricity supplied in Czechia (residual supplier mix)	g CO ₂ /kWh	658.57
Electricity from hydropower	g CO ₂ /kWh	0 ¹³
Electricity from nuclear power	g CO ₂ /kWh	0 ¹⁴
Diesel	g CO ₂ /MJ	74.15
Petrol	g CO ₂ /MJ	69.35
CNG	kg CO ₂ e/kg	2.56816
LNG	kg CO ₂ e/kg	2.59046
WTT electricity	kg CO ₂ e/kWh	0.01830
WTT natural gas	kg CO ₂ e/kWh	0.03347

¹² SPP uses R410A and R407C coolants in its air conditioning equipment. In the automatic fixed fire extinguishing system (AFFES), FM 200 gas (HFC227ea) was replaced with NOVEC 1230 gas with GWP < 1. The regulation of fluorinated gases (F-gases) is defined in Regulation (EU) No 517/2014 on fluorinated greenhouse gases.

¹³ The zero-emission factor was used only for the purposes of calculating total emissions under the rules of the GHG Protocol. With other calculations, we take into account the emission factor of 11 g CO₂/kWh for electricity produced from hydropower, published at the following link: Carbon Neutrality in the UNECE Region: Integrated Life-cycle Assessment of Electricity Sources, United Nations, 2022

¹⁴ The zero-emission factor was used only for the purposes of calculating total emissions under the rules of the GHG Protocol. With other calculations, we take into account the emission factor of 6.4 g CO₂/kWh for electricity produced from nuclear, published at the following link: Carbon Neutrality in the UNECE Region: Integrated Life-cycle Assessment of Electricity Sources, United Nations, 2022

SPP’s business comprises carbon dioxide, due to the combustion of natural gas that we supply to our customers.

Emissions of hydrofluorocarbons used in the cooling equipment are recorded under fugitive emissions. With transport emissions, methane and nitrous oxide emissions were also included in the calculation. With all other emissions, it was just carbon dioxide. Neither SPP nor its subsidiaries produce any biogenic emissions from their own activities.

The GHG Protocol defines three areas of greenhouse gas accounting and reporting, as the so-called Scopes. In this Report, we use the terminology of this standard, i.e. Scope 1, 2, and 3. The distribution of emissions into individual Scopes is as follows:¹⁵

Natural gas in Slovakia	SPP - distribúcia
Natural gas for Czechia	MoEn CZ
R410A air conditioning fluid	SZCHKT
Electricity produced in Slovakia (electricity production energy mix)	AIB European Residual Mix 2023
Electricity supplied in Slovakia (residual supplier mix)	
Electricity produced in Czechia (electricity production energy mix)	
Electricity supplied in Czechia (residual supplier mix)	
Diesel	MoEn SK
Petrol	MoEn SK
CNG	DEFRA, (2024) Fuels, CNG
LNG	DEFRA, (2024) Fuels, LNG
WTT electricity	DEFRA, (2024) Transmission and distribution
WTT natural gas	DEFRA, (2024) Fuels, natural gas

¹⁵ WRI, WBCSD (2004), Greenhouse Gas Protocol Corporate Accounting and Reporting Standard.

SPP Group's emissions in 2024 in Scope 1 (t CO₂e)

	SPP	SPP CNG	SPP CZ
Emissions from own sources	7185	548	-
Vehicles	439	34	58
Fugitive emissions	16	26	-
TOTAL	7640	608	58

By automatically checking for natural gas leaks in other parts of the technology and by automatically shutting down the filling station in the event of any leak, we reduce the risk of leaks to a minimum. Minimising leaks is our priority and we prevent them by regularly checking all pipes and connections, at least once a week. SPP CNG has implemented a policy for reducing and preventing these leaks. In this Scope, we also report emissions associated with the use of cars and premises used by the SPP Group (whether owned or rented).

Scope 2

Indirect emissions arising in the production of purchased energy. SPP, the SPP Foundation, and Ekofond SPP do not register any emissions under Scope 2 as they produce energy internally for their needs and emissions from them are reported in SPP's Scope 1. SPP CNG and SPP CZ purchase electricity and heat for internal needs. The purchased electricity was not covered by guarantees of origin.

Scope 3

Indirect emissions not covered in Scope 1 or 2. These are emissions related to, for example, purchased products and services of the company, commuting to/from work, or the use of company products. In Scope 3, all companies

of the SPP Group report emissions related to the use of their products, i.e. the use of gas, electricity, and also CNG.

According to the GHG Protocol, in Scope 3 we take into account in Category 11: Use of sold products, the emissions related to the supply of gas to end customers and under Category 3: Fuel- and energy-related activities not included in Scope 1 or Scope 2, the emissions related to the supply of electricity to end customers and emissions related to the extraction, processing and transport of gas and electricity supplied to end customers. Up to 100% of emissions in Scope 3 were calculated from internal sources.

The categories listed below are not included in the calculation of total emissions in Scope 3 for the following reasons:

1. Purchased goods and services (Optional subcategory: Cloud computing and data centre services) – emissions are immaterial from the viewpoint of total emissions included in Scope 3
2. Capital goods – emissions are not material from the viewpoint of total emissions – emissions are immaterial from the viewpoint of total emissions included in Scope 3

4. Upstream transportation and distribution – emissions associated with the transportation and distribution of gas as a key source of SPP's turnover, are included in category 3. Activities related to fuel and energy (not included in Scope 1 or Scope 2), other emissions related to transportation to suppliers, are immaterial from the viewpoint of total emissions included in Scope 3
5. Waste generated in operations – emissions are immaterial from the viewpoint of total emissions included in Scope 3
6. Business travel – emissions are immaterial from the viewpoint of total emissions included in Scope 3
7. Employee commuting – emissions are immaterial from the viewpoint of total emissions included in Scope 3
8. Upstream leased assets – SPP uses leasing only for internal vehicles, emissions from the use of which are included in Scope 1
9. Downstream transportation and distribution – emissions related to the extraction, processing, and transportation of gas and electricity supplied to end customers are included in category 3. Activities related to fuel and energy (not included in Scope 1 or Scope 2), other emissions related to transportation to customers are immaterial from the viewpoint of total emissions included in Scope 3
10. Processing of sold products – SPP does not process products, emissions related to the use of sold gas are included in category 11 and emissions related to the use of sold electricity are included in category 3
12. End-of-life treatment of sold products –

emissions related to the use of sold gas and electricity are included in category 11. SPP does not register the use of sold products, other emissions related to the handling of sold products at the end of their life.

13. Downstream leased assets – not applicable to SPP as it does not provide assets in the form of leasing to third parties
14. Franchises – not applicable to SPP as it does not provide franchise licenses to third parties
15. Investments – emissions related to investments, especially the stake in SPP Infrastructure, a.s., and emissions of its subsidiaries operating gas infrastructure, are also emissions that the SPP Group reports in category 3 of Scope 3, other emissions from investments are immaterial from the viewpoint of total emissions included in Scope 3.

The calculation of total greenhouse gas emissions of the SPP Group does not include a separate calculation of emissions from biogenic fuels due to the negligible amount of bioCNG and bioLNG supplied.

The greenhouse gas intensity of the SPP Group is provided in the table below. When converting greenhouse gas intensity into net income, the consolidated turnover of the SPP Group was used, consisting of income from the supply of gas and electricity and related activities and from real estate rental as areas with a large climate impact (page 6 of the Consolidated Financial Statements of SPP and Note 22 to the Notes to the Consolidated Financial Statements of SPP). For comparison purposes, we also include information on greenhouse gas intensity

Table 15 – Greenhouse gas intensity in 2024

Emissions related to internal consumption in tonnes of CO ₂ e (Scope 1 and 2)	Total reported emissions in tonnes of CO ₂ e (so-called CO ₂ equivalents)	Turnover (consolidated) (in € million)	Operating profit (consolidated) (in € million)	Amount of supplied energy in MWh (sum from Table 2)	Greenhouse gas intensity based on turnover (share of total emissions) (in tonnes of CO ₂ e/€)	Greenhouse gas intensity based on operating profit (share of total emissions) (in tonnes of CO ₂ e/€)	Greenhouse gas intensity based on supplied energy (share of total emissions) (in tonnes of CO ₂ e/€)
8829	11249338	3480	164	43974330	0.0032	0.0686	0.2558

converted into operating profit of the SPP Group (i.e. excluding income from dividends) and information on the greenhouse gas intensity converted into the total amount of energy supplied in 2024 as a key activity of the SPP Group.

E1-8 Internal carbon pricing

SPP does not have any internal carbon pricing system implemented. In the coming periods, the company will consider options for internal carbon pricing in order to implement it into internal processes, including procedures for its application within decision-making in respect of achieving greenhouse gas emission reduction targets.

10.5 ESRS E2 Pollution

Identified risks and opportunities:

Energy consumption (internal) – R

As part of reducing pollutant emissions, it is necessary to identify emission reduction tools and key action plans, as well as the adoption of new technologies for SPP. These activities may lead to higher costs.

Identified impacts:

Own energy consumption (pollution) – ANI

The presently operated electricity and heat production sources of SPP are a source of pollutants; without replacing them and reducing energy consumption, the negative impact on the air will continue.

Information under this standard does not include SPP CZ or SPP CNG, as it was assessed as insignificant.

E2-1 Policies related to pollution

SPP's policy comprises a system of internal documentation consisting of strategic documents listed below, parts of the company's basic documentation, internal regulations, and the certified integrated management system.

SPP has policies in place in the field of environmental pollution prevention. The basic documents that also regulate pollution are the SPP Sustainability Strategy 2050 and the Sustainability Management Programme (more

information in ESRS 2 General Disclosures SBM-1 Strategy, Business Model and Value Chain section).

Along with basic documentation, pollution prevention and the main areas of environmental management (air protection, water protection, waste management, nature and landscape protection, and chemical substances) are regulated by the internal regulations of SPP, in particular by the internal regulation called "Environmental Protection" and annexes thereto.

SPP has an established and certified Integrated Management System (IMS) according to ISO 9001:2015 (Quality management system) and ISO 14001:2015 (Environmental management system), as well as Environmental Management and Audit Schemes (EMAS), regulating the area of pollution prevention and air protection.

SPP is not a manufacturing company and the impacts related to environmental pollution mostly relate to the operation and maintenance of SPP's buildings and sites. The Integrated Management System of SPP sets short-term and long-term environmental targets in the interest of reducing these impacts, pursuing programmes to achieve them.

To prevent environmental pollution, SPP regularly assesses the integrated management system through internal and external audits and incorporates any recommendations, non-conformities or risks into the company's internal regulations and processes. SPP also provides

regular annual employee training, maintains internal registers of compliance with legislation, regularly monitors legislation, and performs inspections in accordance with the inspection activity plan.

The policy is binding for all employees of SPP, for everyone who moves around SPP's sites and at SPP's workplaces, as well as for everyone who carries out activities related to the environment or impacting the environment. It is published on the intranet, the company's website and in the internal regulation.

The SPP Sustainability Strategy 2050 and the Sustainability Management Programme are approved by the Board of Directors, which is the highest SPP body responsible for overseeing the impacts of SPP's activities and their reduction. The approval of internal regulations in the field of pollution prevention falls within the purview of the SPP CEO. The SPP CEO decides on necessary measures and instructions for ensuring proper functioning of the company in a manner bound by applicable legal regulations, while also creating, implementing, maintaining and continuously improving the quality management system and the environmental management system.

The policy summarises the company's firm commitment to environmental protection, including pollution prevention. It provides a framework for setting environmental targets based on the assessment of environmental aspects. The policy includes a commitment

to comply with binding requirements and to regularly monitor and assess them. The prevention of non-conformities and incidents is stipulated in SPP's internal regulations. The policy applies the principle of preventive and systemic measures.

SPP does not produce, use, distribute, import or export any substances or mixtures of very high concern (SVHC). When using chemical substances and chemical mixtures and complying with REACH, CLP, and Act No. 67/2010 Coll. on the conditions for introducing chemical substances and chemical mixtures to the market, amending and supplementing certain acts (the "Chemical Act"), we always require the submission of Safety Data Sheets (SDS) and maintain records on them. SDS must be prepared in accordance with Regulation (EC) 1907/2006 (REACH), as amended. We are responsible for the review of SDS for the substance – natural gas, which was conducted on 30 March 2023.

E2-2 Actions and resources related to pollution

We monitor all sources of pollution and regularly report on emissions in accordance with legislative requirements.¹⁶

In total, SPP operates 23 small and 11 medium air pollution sources throughout Slovakia. For the purposes of SPP Customer Centres, we use another 17 buildings as a tenant (the pollution source is registered to the landlord).

Under applicable legislation, we are not required to submit to local government authorities the data necessary to determine the amount of air pollution fee for operated small air pollution sources. We provide the information for calculating the air pollution fee for medium-sized sources of air pollution to district offices electronically via the National Emission Information System (NEIS). The data are sent directly to the respective district offices and the operator is informed by notification about their processing.

We calculate emissions other than greenhouse gas emissions in NEIS based on available emission factors via the Slovak Hydrometeorological Institute. These emissions comply with emission limits as stipulated by Slovak legislation.¹⁷ The calculation is made based on the approved procedure for calculating the amount of pollutant emissions. The calculation procedure is approved by the competent district office when permitting the source for use.

The corresponding pollution source fee is generated in the NEIS information system depending on the amount of pollutants. The basic fees are determined by legislation in the

Annex to Act No. 190/2023 on air pollution fees. If the established basic fee of €500 is exceeded, the applicable district office sends a decision determining the amount of air pollution fee to be paid.

Where an air pollution source is subject to authorised emission measurement, the emission data are also available in the final report on the emission measurement performed at the source. We transparently inform the public on our website about the results of periodic measurements and the impact of medium-sized sources of air pollution with a total rated thermal input of over 300 kWh.¹⁸

If any determined limits are exceeded during regular measurements, we identify the cause and implement measures to reduce emissions, for example by installing additional catalytic converters. As part of standard planning processes, SPP regularly allocates adequate funds for impact reduction measures in the annually compiled Business Plan. In 2019, SPP reconstructed the boiler room at the SPP site in Žilina and in 2025 it plans to reconstruct the boiler rooms at SPP sites in Michalovce and Prešov, as well as to replace the cogeneration unit in the CHP facility in Bratislava.

Table 16 – Medium pollution sources subject to authorised measurement

Name (total output)	Operation
Cogeneration units (2 362 kWe and 3 350 MWt) Gas boilers (2 370 kW)	Bratislava
Gas boilers (1 215 kW)	Michalovce
Gas boilers (638 kW)	Košice (Moldavská Street)
Gas boilers (840 kW)	Košice (Rozvojová Street)

¹⁶ § 33a (1) of Act No. 17/1992 Coll. on the Environment; § 15 (1) (ah) of Act No. 137/2010 Coll. on Air and Decree No. 411/2012 Coll. on monitoring emissions from stationary sources of air pollution and air quality in their surroundings, as amended.

¹⁷ In Decree No. 410/2012 Coll., implementing certain provisions of the Air Act, Part IV, point 3.2 – Combustion of gaseous fuels except combustion in gas turbines and piston-based combustion engines and Part IV, point 5.2 – Combustion equipment consisting of stationary combustion engines.

¹⁸ <https://www.spp.sk/sk/vsetky-segmeny/o-spp/udrzatelnost-a-ochrana-zivotneho-prostredia/plnenie-standardov/>

E2-3 Targets related to pollution

SPP did not set any environmental pollution target values in 2024. In line with applicable regulations of the Ministry of Environment of the Slovak Republic, periodic authorised measurement of emissions is subject to compliance with the specified emission limit for CO and NOx from combustion equipment, in the following scope:

- Combustion of gaseous fuels, except combustion in gas turbines or piston-based internal combustion engines;
- Combustion equipment composed of stationary piston-based internal combustion engines.

The emissions from combustion equipment with a rated thermal input of less than 0.3 MW must comply with the requirements and operating conditions as per technical standards.

Air pollutant emissions from combustion sources (excluding greenhouse gas emissions) are generated in connection with the internal operation of SPP and the consumption of fossil fuels for heating purposes. Therefore, air pollutant emissions should decrease along with measures taken to reduce greenhouse gas emissions related to internal operation as per

the SPP Sustainability Strategy 2050, which sets the target to reduce greenhouse gas emissions from internal operation by 100% (net-zero, as concerns emissions from SPP's internal operation compared to 2021) by 2040.

For the coming years, SPP also adopted targets related to internal operation set out by 2026 (more in section ESRS 2 General disclosures SBM-1 Strategy, business model and value chain). More information on progress in the implementation of these targets is provided by SPP in section ESRS E1 Climate change.

E2-4 Pollution of air, water and soil

The measurement of emissions is carried out by an authorised person who subsequently assesses compliance or non-compliance with the emission limit. The notification of a planned periodic discontinuous emission measurement, as well as the report on a periodic authorised emission measurement, is sent by the authorised person to the information system of the Slovak Hydrometeorological Institute. In 2024, we did not perform any periodic discontinuous emission measurements. The next emission measurement is planned for 2026 at the cogeneration unit and gas boilers in Bratislava.

Table 17 – Air emissions from medium pollution sources in 2024 (in t)

Solid pollutants (SP)	Sulphur oxides (SOx)	Nitrogen oxides (NOx)	Carbon monoxide (CO)	Total carbon (TOC)
0.2383	0.0299	4.5851	1.8485	0.3080

The data collection process is based on reading the natural gas consumption meters and recording the consumption of fuel added to diesel generators. The data on added fuel to diesel generators is provided in litres. For the purposes of annual reporting, the data are converted into tonnes. Diesel consumption data are provided by the contractual operator of technical equipment.

We directly produce only a limited amount of other emissions, except greenhouse gas emissions that are caused by the operation of cogeneration units, gas boilers and diesel generators used to produce heat, water heating, cooling, or electricity for buildings owned by SPP. We achieve the reduction of emissions through measures to streamline operation, by replacing older sources with more modern ones, and by selling the sites and buildings, operation of which is backed by the sources.

The reduction of emissions in 2024 compared to previous years is directly proportionate to fuel consumption, which was lower at most sources, and to the sale of real estates to third parties (along with certain pollution sources). Given the administrative nature of our activities, SPP considers microplastic pollution related to our own activities to be insignificant.

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

SPP does not produce, use, distribute, import or export any substances or mixtures of very high concern (SOVHC) or substances of concern

(SOC). When using chemical substances and chemical mixtures and complying with REACH, CLP, and Act No. 67/2010 Coll. on the conditions for introducing chemical substances and chemical mixtures to the market, amending and supplementing certain acts (the "Chemical Act"), we always require the submission of Safety Data Sheets (SDS) and maintain records on them.

SDS must be prepared in accordance with Regulation (EC) 1907/2006 (REACH), as amended. We are responsible for the review of SDS for the substance – natural gas, which was conducted on 30 March 2023. All safety data sheets are kept in the Besoft application – chemical substances module at the Occupational Safety and Health Department. Most of the chemicals used in routine operation and maintenance are the responsibility of the supplier companies providing individual services.

SPP employees handle chemical substances only in the premises of the company canteen in Bratislava in accordance with the Operating Rules for Work Activities Involving Exposure to Chemical Factors at Work. The Operating Rules, including assessment of occupational risk, have been prepared in accordance with the Regulation of the Government of the Slovak Republic No. 355/2006 Coll. on the protection of employees from risks related to exposure to chemical factors at work, as amended. These substances are not classified as substances of concern or of very high concern.

10.6 ESRS E3 Water and marine resources

Identified impacts:

Water quality monitoring – PPI

Water quality monitoring helps to identify and minimise negative environmental impacts. Early detection of water quality problems allows the adoption of measures to prevent accidents and minimise risks by ensuring safe and efficient operation and the protection of health and the environment.

Information under this standard does not include SPP CZ or SPP CNG, as it was assessed as insignificant.

E3-1 Policies related to water and marine resources

SPP's policy comprises a system of internal documentation consisting of strategic documents listed below, parts of the company's basic documentation, internal regulations, and the certified integrated management system.

The rules of responsible water management in accordance with legislative requirements and the implemented certified environmental management system are defined by SPP's internal regulations.

SPP has an established and certified Integrated Management System (IMS) according to ISO 9001:2015 (Quality management system) and ISO 14001:2015 (Environmental management

system), as well as the Environmental Management and Audit Schemes (EMAS), regulating the area of water management.

SPP is not a manufacturing company and water is used primarily for operating needs and maintenance of buildings and respective sites. The Integrated Management System of SPP sets short-term and long-term environmental targets in the interest of reducing these impacts, pursuing programmes to achieve them. SPP does not manage any marine resources.

To manage water effectively, SPP regularly assesses the water management system through internal and external audits and incorporates any recommendations, non-conformities, or risks into the company's internal regulations and processes. SPP also maintains internal registers of compliance with legislation, regularly monitors legislation in the field of water management, and performs inspections in accordance with the inspection activity plan. SPP appointed a water manager as per the applicable legislation and an organisational unit responsible for managing energy facilities.

The policy is binding for all employees of SPP, for everyone who moves around SPP's sites and at SPP's workplaces, as well as for everyone who carries out activities related to the environment or impacting the environment.

The approval of internal regulations in the field of water management falls within the powers of the SPP CEO. The SPP CEO decides on necessary

measures and instructions for ensuring proper functioning of the company in a manner bound by applicable legal regulations, while also creating, implementing, maintaining and continuously improving the quality management system and the environmental management system.

SPP makes sure that stakeholders are informed in multiple ways, mainly through the website. All employees are acquainted with the policies governing water management and updates thereto through internal regulations and regular training.

SPP informs employees about current measures via standard internal information means (intranet, internal magazine). At the same time, the company provides employees with the opportunity to report any need to adopt additional measures in water management or violations of internal policies or obligations in a form available to all employees.

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

SPP continuously adopts measures to reduce water consumption and ensure its effective use, and it plans to continue adopting such measures in future. The effectiveness of these measures is regularly monitored and evaluated by SPP by assessing the change in total consumption compared to previous periods. As part of standard planning processes, SPP regularly allocates adequate funds for measures to reduce impacts and for economical water use in the annually compiled Business Plan. The measures listed below did not require any significant capital

expenditures, operating expenses, or other financial resources during the reporting period.

Our economic use of water is achieved primarily through proper maintenance of equipment and its regular replacement, the installation of water saving devices, early identification of excess consumption, and by adopting measures aimed at preventing and eliminating accidents and malfunctions in water distribution systems at SPP premises and sites.

These measures resulted in a lower number of accidents and malfunctions, as well as the shorter duration of water leaks and lower overall consumption of water purchased from suppliers. Lower groundwater consumption compared to previous years is a consequence of lower consumption at cooling towers in connection with the production of cooling at the SPP site in Bratislava during the summer months.

We purchase water from regional water companies, except for utility water at the SPP site in Bratislava, which we get from our own well.

We regularly monitor and report quantitative and qualitative indicators to Slovenský vodohospodársky podnik, š. p., (Slovak Water Management Company, state enterprise) and to the Slovak Hydrometeorological Institute. In the event of any exceptional deterioration of water quality, we have prepared the Preventive Measures Plan to prevent the occurrence of any uncontrolled release of pollutants and the so-called emergency plan that defines the procedure in case of any release of pollutants at the sites in Bratislava and Košice (Moldavská cesta 12).

We have been issued a permit for groundwater collection and for discharging wastewater and surface runoff into surface waters at locations where water discharge occurs. We perform regular analyses that result from decisions and contracts with water companies. We transparently inform the public about the quality analyses of water discharged from surface runoff in Nové Mesto nad Váhom and water from surface runoff and municipal water treated by the wastewater treatment plant in Spišská Belá. In accordance with the contract, we regularly perform analyses in an accredited laboratory. We regularly check the pollution level of wastewater discharged into public sewers at the following locations:

- Bratislava, Mlynské nivy 44/a,
- Košice, Rozvojová 6,
- Levice, SNP 34,
- Michalovce, Plynárenská 4,
- Nitra, Levická 9.

We evaluate the values of pollution indicators of discharged wastewater and special waters in accordance with the limits set by Slovak legislation.¹⁹ If any irregularities are detected, we take corrective measures, such as regular cleaning of the sewer network, sewer inlets and

applicable water structures, such as oil separators or grease traps, landscaping to prevent water level surges, repairs of pumps in the event of failure, and others, and we subsequently make repeat control analyses in an accredited laboratory. The process and maintenance of the sewer network and applicable water structures and equipment is set out in the sewer network operating rules, which have been prepared for each SPP facility. Every activity, such as service or wastewater analysis, is recorded in the operating logbook.

E3-3 Targets related to water and marine resources

SPP did not have any target values related to water resources established in 2024. SPP is not a manufacturing company and consumption of water resources related to SPP's activities occurs mainly in the operation and maintenance of buildings. Given the above, SPP does not plan to set any target values related to water resources. SPP has set limit values for groundwater withdrawal from its well, to a maximum of 47304 m³/year, pursuant to the applicable decision issued by the district office.

Table 18a – Overview of water consumption in 2024 (in m³)

Water withdrawal by source		Total water consumption	Discharged water by destination	
Groundwater	Water from regional water companies		Groundwater	Total water discharged
20 866	32 348	53 214	31 028	31 028

¹⁹ Regulation of the Government of the Slovak Republic No. 269/2010 Coll., which establishes the requirements to achieve good status of waters.

E3-4 Water consumption

Total water consumption in 2024 was as follows:

SPP does not consume water in water-stressed areas, including areas with high water scarcity, recycled water, or reused water, and we also do not store any water. The water consumption intensity is shown in the table below. When converting water consumption intensity into net income, the consolidated revenues of the

SPP Group were used, consisting of revenues from the supply of gas and electricity and related activities and from real estate rental, as sectors with a large climate impact (page 6 of the Consolidated Financial Statements of SPP and Note 22 to the Notes to the Consolidated Financial Statements of SPP). For comparison, we also provide information on energy intensity converted into operating profit of the SPP Group (i.e. excluding income from dividends).

Table 18b – Water consumption intensity of SPP based on turnover and operating profit in 2024

Total water consumption (in m ³)	Turnover (consolidated) (in € million)	Operating profit (consolidated) (in € million)	Water consumption intensity based on revenues (in m ³ /€ million)	Water consumption intensity based on operating profit (in m ³ /€ million)
53 214	3 480	164	15.291	0.324

10.7 ESRS E4 Biodiversity and ecosystems

Identified impacts:

Impact on biodiversity – PNI

Potential negative impact on the environment when constructing new energy production sources at locations where they could negatively affect biodiversity.

Information under this standard does not include SPP CZ or SPP CNG, as it was assessed as insignificant.

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

The SPP Sustainability Strategy 2050 and the Sustainability Management Programme (more information in section ESRS 2 General Disclosures SBM-1 Strategy, Business Model and Value Chain) are aimed at SPP's key impacts on climate change and their elimination by supporting measures to reduce energy consumption and by developing projects for our own energy production from RES. The SPP Sustainability Strategy 2050 and the Sustainability Management Programme do not specifically take into account the protection of biodiversity and ecosystems.

As part of its service offerings, SPP continued to provide customers with the SPP Carbon Footprint service in 2024, which includes,

among others, support for tree planting in protected areas of Slovakia. SPP also supports projects for preserving or restoring biodiversity through its non-profit organisation, Ekofond SPP.

E4-2 Policies related to biodiversity and ecosystems

SPP's policy comprises a system of internal documentation consisting of strategic documents listed below, parts of the company's basic documentation, internal regulations, and the certified integrated management system.

The SPP Code of Conduct, which forms part of the basic documentation, sets out our commitment to minimise adverse impacts on the environment and to comply with obligations arising from environmental regulations.

In addition to basic documentation, the method of protecting nature and the landscape is also regulated by SPP's internal regulations in accordance with legislative requirements and the implemented certified environmental management system.

SPP has an established and certified Integrated Management System (IMS) according to ISO 9001:2015 (Quality management system) and ISO 14001:2015 (Environmental management system), as well as the Environmental Management and Audit Schemes (EMAS), regulating the field of nature and landscape protection.

SPP is not a manufacturing company and does not have operations in protected areas, in the immediate vicinity of protected areas, or in areas of high biodiversity value outside of protected areas. Potential impacts on the protection of biodiversity and ecosystems related to SPP's activities may arise indirectly in connection with internal operation or as a result of SPP's key activities, which include the supply of gas and electricity. These impacts are addressed by measures as per the SPP Sustainability Strategy 2050 to reduce other impacts, particularly in the field of climate change.

Another potential area of SPP activities impacting the protection of biodiversity and ecosystems are the projects for our own energy production from RES. When developing them, SPP strictly adheres to applicable legal regulations in the field of environmental protection and permissions, which include sufficient guarantees for ensuring the protection of biodiversity and ecosystems. At the same time, when preparing projects for our own energy production from RES, SPP makes sure projects are implemented in accordance with the requirements of the EU Taxonomy for sustainable investments.

In the interest of ensuring the protection of biodiversity and ecosystems within internal operation, SPP regularly assesses nature and landscape protection systems and incorporates any recommendations, non-conformities, or risks into the company's internal regulations and processes. SPP also maintains internal registers of compliance with legislation, regularly monitors legislation, and performs inspections in

accordance with the inspection activity plan.

The policy is binding for all employees of SPP, for everyone who moves around SPP's sites and at SPP's workplaces, as well as for everyone who carries out activities related to the environment or impacting the environment.

The SPP Code of Conduct is approved by the Board of Directors, which is the highest SPP body responsible for overseeing the impacts of SPP's activities and their reduction. The approval of internal regulations in the field of biodiversity and ecosystems protection falls within the powers of the SPP CEO. The SPP CEO decides on necessary measures and instructions for ensuring proper functioning of the company in a manner bound by applicable legal regulations, while also creating, implementing, maintaining and continuously improving the quality management system and the environmental management system.

SPP makes sure that stakeholders are informed in multiple ways. All employees are acquainted with policies governing the protection of biodiversity and ecosystems and updates thereto, through internal regulations and regular training.

SPP informs employees about current measures using standard internal information means (intranet, internal magazine). At the same time, the company provides employees with an opportunity to report any need to take additional measures in biodiversity and ecosystems protection or violations of internal policies or obligations in a form available to all employees.

SPP proactively communicates with local governments and local communities about projects for energy production from RES (electricity production by wind farms or EBWRCs aimed at waste processing and biomethane production). This communication takes place in the form of personal meetings and/or by provision of information about projects via local media. More information about activities that took place in 2024 is provided in section ESRS S3 Affected communities.

SPP also regularly informs customers who use the Carbon Footprint service about the extent of planting by special communication and on the SPP website. The activities aimed at preserving or restoring biodiversity, which are implemented by Ekofond SPP, are communicated directly by Ekofond SPP or SPP via the website or by press releases or other form of marketing communication.

E4-3 Actions and resources related to biodiversity and ecosystems

More than one hundred thousand customers have used the SPP Carbon Footprint service since 2020. In addition to providing advice on more sustainable solutions (not only in the power sector) and motivating customers to cut their energy consumption, it also includes SPP's commitment to support tree planting in protected areas of Slovakia.

Together with SPP customers, the company supported the planting of more than 1.9 million saplings in protected forests of Slovakia

between 2020 and 2024. This planting took place in the territories of the Tatra National Park Administration (TANAP), the Low Tatras National Park, the Veľká Fatra and Malá Fatra National Parks, the Pieniny National Park, as well as in the Choč Mountains Protected Bird Area.

In 2024, SPP supported forest restoration by planting more than 688 000 trees, such as in the locations of Matiašovce, Ludrová Valley, Demänová, Hrabovo – Poľany, Babky, Kráľová Lehota, Liptovská Anna – Húkovie, Beňušovce Grooves, Liptovský Ján Valley – Hamlets, Tatranská Javorina, Tatranské Matliare, Jalovec Valley, Liptovské Kľačany, Stráne Forrest. Those were protected areas, areas of European importance – NATURA 2000, and protected bird areas with nesting species including the golden eagle, the wood grouse, and other protected bird species. For the company, it is crucial to plant diverse tree species in protected forests where the trees are guaranteed to be protected from logging. In this way, they can truly make a contribution to preserving biodiversity, as well as to protecting the air and reducing greenhouse gas emissions.

When planting trees, SPP cooperates with biodiversity protection experts from the Tatra National Park Administration (TANAP).

The objectives of key RES projects are subject to assessment of their environmental impact before implementation, whether they are wind farm projects, or waste management and biomethane production projects. As part of this process, SPP safeguards the preparation of submissions, studies, and expert appraisals

necessary to objectively assess the potential impact of projects on the protection of biodiversity and ecosystems – including ornithological studies, noise studies, public health impact assessments, and others.

In 2024, SPP began preparing a project for installing anti-collision stickers to prevent bird strikes on glass surfaces at its buildings in Bratislava. Based on the on-site inspection with the State Nature Conservation of the Slovak Republic, a document entitled 'Measures proposed to minimise bird strikes on glass surfaces of SPP and MoE buildings' was prepared. The project will be implemented in 2025, in cooperation with Ekofond SPP. In the field of nature and landscape protection, we fulfil our legal obligations regarding tree felling, replacement planting, and exceptions to species protection.

10.8 ESRS E5 Resource use and circular economy

Identified risks and opportunities:

Development of biomethane production – O

The modernisation associated with the development of RES sources in EBWRC projects focusing on waste processing for biomethane production creates an opportunity for SPP to strengthen its position and differentiate itself on a rapidly changing market.

Identified impacts:

Waste from internal operations – ANI

Waste is a burden that creates a negative impact on the environment. Waste from internal activities of SPP is mainly generated by the operation of SPP's office spaces. At the same time, SPP leases several properties and their operation requires regular reconstruction, generating a large amount of construction waste.

Information under this standard does not include SPP CZ or SPP CNG, as it was assessed as insignificant.

E5-1 Policies related to resource use and circular economy

SPP's policy comprises a system of internal documentation consisting of strategic documents listed below, parts of the company's basic documentation, internal regulations, and the certified integrated management system.

Resource use and the circular economy are governed by the SPP Sustainability Strategy 2050 and the Sustainability Management Programme (more information in section ESRS 2 General Disclosures SBM-1 Strategy, business model and value chain), namely in the field of reducing waste from SPP's internal operation and in the field of developing biomethane production from biodegradable waste.

In addition to basic documentation, the method of waste handling in accordance with legislative requirements and certified management systems is also governed by other internal regulations of SPP.

SPP has an established and certified Integrated Management System (IMS) according to ISO 9001:2015 (Quality management system) and ISO 14001:2015 (Environmental management system), as well as Environmental Management and Audit Schemes (EMAS), regulating the area of waste handling.

SPP is not a manufacturing company and waste related to SPP's activities arises mainly from the purchase of goods and services for the purpose of the operation, maintenance, and reconstruction of real estate, from the liquidation of unused sites, worn-out property, office activities and normal consumption by our employees or as part of customer service.

To reduce the amount of waste and maximise its reuse, SPP regularly evaluates its waste

management system and incorporates any recommendations, non-conformities, or risks into the company's internal regulations and processes. SPP also maintains internal registers of compliance with legislation, statistics on waste management optimisation statistics and waste generation, regularly monitors waste management legislation, and performs inspections in accordance with the inspection activity plan.

The policy is binding for all employees of SPP, for everyone who moves around SPP's sites and at SPP's workplaces, as well as for everyone who carries out activities related to the environment or impacting the environment.

The SPP Sustainability Strategy 2050 and the Sustainability Management Programme are approved by the Board of Directors, which is the highest SPP body responsible for overseeing the impacts of SPP's activities and their mitigation. The approval of internal regulations in the field of waste management falls within the powers of the SPP CEO. The SPP CEO decides on necessary measures and instructions for ensuring proper functioning of the company in a manner bound by applicable legal regulations, while also creating, implementing, maintaining and continuously improving the quality management system and the environmental management system.

SPP makes sure that stakeholders are informed in multiple ways. All employees are acquainted with the policies governing waste management and updates thereto through internal regulations and regular training.

SPP informs employees about current measures via standard internal information means (intranet, internal magazine). At the same time, the company provides employees with the opportunity to report any need to take additional measures in waste management or violations of internal policies or obligations in a form available to all employees.

SPP proactively communicates with local governments and local communities about EBWRC projects aimed at waste processing and biomethane production. This communication takes place in the form of personal meetings and/or by the provision of information about projects via local media. At the same time, SPP has established a special website odpadjesupa.sk that provides detailed information about the scope, impacts, and benefits of projects.

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

SPP aims to minimise the amount of waste and maximise its reuse. Where possible, we extend the life of assets and use them for as long as possible.

When purchasing goods for office operations, the company prefers certified products with an environmental label and suppliers with an established environmental management system according to the requirements of ISO 14001:2015 or EMAS.

In the procurement process for construction works, SPP applies the environmental characteristics of green procurement and requires suppliers to handle waste fully in accordance with the Waste Act and to preferentially hand over waste for material recovery or recycling, with an emphasis on demonstrating compliance with legislative requirements for waste processing. The revenue generated from any recovery or sale of waste becomes SPP's revenue.

The obligations arising from the extended liability of SPP as a manufacturer of packaging and non-packaging reserved products are fulfilled by the company through an authorised producer responsibility organisation, in accordance with the Waste Act.

SPP has long preferred the use of electronic communication in servicing its customers. Customers from each segment have the option of concluding contracts electronically, electronic billing, and communicating via the portal My SPP.

Therefore, SPP annually undertakes campaigns aimed at motivating customers to use electronic communication. However, the final decision always rests with the customer, in line with legislation. With paper-based communication, SPP's paper consumption is significantly increased by obligations arising from regulations governing the relationship between gas and electricity suppliers and customers.

In 2024, approximately 43.5% of the total number of almost 1.5 million customers used

electronic billing. Also, the number of customers registered on the My SPP portal exceeded 255 000 by the end of 2024.

With the aim of securing material recovery, we arrange waste removal and disposal via authorised companies. In its premises, SPP ensures the separate collection of plastic, paper and glass waste, biodegradable kitchen waste, portable batteries and accumulators, as well as small electrical waste and cigarette butt filters.

The company provides surplus or discarded assets (IT equipment, office furniture) that can be used further as a donation to public sector entities (such as schools or healthcare facilities).

E5-3 Targets related to resource use and circular economy

Given that waste is generated primarily in connection with the operation and maintenance of SPP buildings, the SPP Sustainability Strategy 2050 requires, as one of the company's targets in resource use and a circular economy, the continuous adoption of measures to reduce waste generation in SPP buildings.

The second important source of waste related to SPP's activities is waste created in connection with the sale of gas and electricity to customers (contractual and invoicing documentation and other customer communication, if in paper form). In this field, the SPP Sustainability Strategy 2050 sets the goal of minimising paper consumption by 2026 via digitalisation

of applicable processes (taking into account legislative settings).

E5-4 Resource inflows

Although the topic E5-4 Resource inflows is not assessed as material in the dual materiality analysis, SPP reports some partial information in the field of resource inflows in the interest of providing sufficient context for other information under the standard ESRS E5 Resource use and circular economy.

For its operation, SPP uses primarily resources related to the operation of office spaces and employee activities, and also customer service. These resources primarily include energy consumption for the operation of buildings, fuels in transport, office supplies, and IT equipment. The information on energy consumption for the operation of buildings and on fuel consumption in transport is presented in section ESRS E1-5 Energy consumption and mix. The information on energy consumption for the operation of buildings and on fuel consumption in transport comes from direct measurements. In the coming years, SPP will adopt measures to keep records on additional resources used in its operation.

Where possible, the company uses environmental criteria when purchasing commodities, especially by taking into account the submission of a list of eco-friendly products and certificates, e.g. FSC (Forest Stewardship Council), PEFC schemes (Programme for the Endorsement of Forest Certification), EU Ecolabel, or other equivalent certificates issued

by an independent accredited institution (ISO 9000, ISO 14000, EMAS, FLEGT licenses).

Within the procurement process and the management of contractual supplier relationships, SPP promotes the "sustainable procurement" concept by applying environmental or social elements and conditions to its procurement processes, where this is purposeful and appropriate given the subject of procurement and, at the same time, by applying modern criteria for evaluating bids with the aim of obtaining the "best value for money", in particular criteria based on cost-effectiveness (e.g. Total Costs of Ownership – TCO, Life Cycle Costs – LCC) or criteria aimed at obtaining the best balance between the price and quality of the delivered performance, or possibly the criteria taking into account environmental or social aspects in relation to the procurement subject.

E5-5 Resource outflows

SPP keeps detailed waste records in accordance with applicable legislation. In 2024, SPP produced slightly more than 564 tonnes of waste in total, of which more than 551 tonnes were recovered. Approximately 56% of generated waste comprised waste from construction and servicing works. In 2024, SPP kept waste records in the following categories as per ESRS E5-5 Resource outflows:

1. Hazardous waste disposed of in the amount of 100.21 tonnes
2. Hazardous waste disposed of by recycling in the amount of 100.21 tonnes
3. Non-hazardous waste diverted from disposal in the amount of 451.3 tonnes
4. Non-hazardous waste disposed of by recycling in the amount of 451.3 tonnes
5. Non-hazardous waste designated for disposal in the amount of 13.23 tonnes
6. Non-hazardous waste designated for landfilling in the amount of 13.23 tonnes
7. Unrecycled waste in the amount of 13.23 tonnes
8. The share of non-recycled waste reached 2.34%
9. Total hazardous waste in the amount of 100.21 tonnes

In 2024, SPP did not register any waste in other categories set out in ESRS E5 Resource outflows. Given that applicable legislation allows the use of general waste management codes, the above data related to the waste recovery or disposal category take into account the separation based on information available to SPP, as well as the anticipated waste processing (exact data on the recovery or disposal category cannot be established in all cases of waste disposal since, especially in the case of work activities mediated through suppliers, the documents are kept as per the applicable waste stream without a known end facility in most cases).

A more detailed breakdown of waste produced by SPP in 2024 by quantity and type is provided below:

Table 19 – Amount and types of produced waste

Waste diverted from landfill in tonnes (t)	At the workplace (t)	Outside the workplace (t)	Total (t)
Hazardous waste	100.21	0.00	100.21
Non-hazardous waste	245.84	205.47	451.30
TOTAL			551.51
Landfilled or incinerated waste in tonnes (t)	At the workplace	Outside the workplace	Total
Hazardous waste	0.00	0.00	0.00
Non-hazardous waste	5.59	7.64	13.23
TOTAL			13.23
Types of waste	Waste produced (t)	Waste diverted from landfill (t)	Landfilled or incinerated waste (t)
Construction and demolition waste (concrete, small construction waste, gypsum-based building materials, bitumen mixtures, metals, soils)	213.11	205.47	7.64
Decommissioning of assets, e.g. furniture, IT equipment, sanitary ware, other equipment (bulky waste, electrical and electronic equipment, metals, mixed construction and demolition waste)	92.405	86.82	5.59
Kitchen and other biodegradable waste, edible oils, and fats	107.33	107.33	0.00
Other separate collection from operation of buildings (paper and cardboard, paper and cardboard packaging, plastic packaging, glass packaging)	50.313	50.31	0.00
Waste from operation and maintenance of technologies (oil filters, mineral oils, mixtures of fats and oils from oil-water separators)	101.591	101.59	0.00
TOTAL	564.75	551.52	13.23

10.9 ESRS S1 Own workforce

Identified impacts:

Working conditions – PPI

Working conditions directly influence employee satisfaction and productivity. A quality work environment can reduce employee turnover and improve employee loyalty. Moreover, good working conditions contribute to the company's positive image and its competitiveness on the market.

Diversity and inclusion – PPI

Support for diversity and inclusion can positively influence internal relations and the diversity of opinions, as well as create an opportunity to become an attractive employer. Creating an inclusive work environment increases employee satisfaction and their engagement. Moreover, diversity and inclusion contribute to the company's positive image and its attractiveness to talented employees.

Information as per this standard apply to SPP. Information about SPP CZ and SPP CNG is included only where explicitly stated. In other cases, given the number of people employed in SPP CZ and SPP CNG, information about these companies was assessed as immaterial.

S1-1 Policies related to own workforce

Employees are a crucial part of SPP's success. SPP's priority is to ensure everybody working for SPP feels safe and has the space created

to do their jobs, regardless of whether they provide direct contact with customers, trade in commodities, engage in support activities, the operation of buildings, or deal with information and cyber security. Improving the working environment, a high level of corporate culture and shared values are prerequisites to building a safe environment.

SPP fully respects the freedom and equality of all people, regardless of race, origin, colour, sex, gender identity, sexual orientation, nationality, age, physical or other handicap, language, religion, political or other persuasion, family, or any other status. SPP upholds fundamental human rights and freedoms as defined, inter alia, in the United Nations Universal Declaration of Human Rights, the Council of Europe Convention for the Protection of Human Rights and Fundamental Freedoms, and the Charter of Fundamental Rights of the European Union (EU). The company does not tolerate any form of discrimination.

As part of the basic documentation, the SPP Code of Conduct regulates explicitly the commitment of SPP to comply with applicable legal regulations governing employee rights, and also stipulates zero tolerance to any form of illegal employment, slave labour, human trafficking, or child labour.

The SPP Code of Conduct applies to SPP, SPP CZ, and SPP CNG, which means it is binding on the actions of all employees of these companies,

as well as their business partners. The SPP Code of Conduct applies both in Slovakia and the Czech Republic, while considering the cultural, social, and economic differences between these countries; where a reference to Slovak legislation is made, the corresponding legal regulation governing the same area in the Czech Republic applies accordingly.

The SPP Work Rules is the basic internal labour-law regulation, which details and specifies the rights and obligations of SPP employees arising from generally binding legal regulations, the Collective Agreement, or their employment contract. It is binding on the employer and on all employees of SPP who have concluded contracts of employment with the employer.

The SPP Work Rules apply also to employees performing work for the employer based on agreements on work performed outside of employment, only if explicitly stated so in the concluded agreement. Every employee of SPP must be demonstrably familiarised with the contents of the Work Rules, which are available to every employee on SPP's intranet and from their direct superior.

The Organisational Rules is the basic governing document and organisational standard of the company, establishing the management method of the company as a whole. It determines the management relationships between the Board of Directors, as the statutory body of the company, the CEO, divisions, sections, and lower tier organisational units. It defines the internal organisational structure of the company.

The Collective Agreement regulates the mutual rights and obligations of the employer and the trade union organisation operating at the employer, as well as the social, wage, and other entitlements of employees. The Collective Agreement stipulates the benefits, payments, days off, etc., to which an SPP employee is entitled.

Employees are employed by way of employment contracts in accordance with the law, while complying with employee rights. In any restructuring or redundancy process, SPP adheres to objective criteria and basic ethical standards. The layoff process must be announced in advance, be transparent and take into account basic psychological considerations. SPP is committed to cooperating and maintaining a partnership relationship with the company's trade union representatives.

The protection of health and safety of employees and persons performing activities for SPP is a priority in the direction of the company, in accordance with the requirements of high safety standards. SPP discharges of OHS tasks and requirements mainly through preventive activities, compliance with internal regulations, applicable legislation, and standards.

Providing a hygienically-sound and safe working environment is, among other things, guided by scientific know-how and utilises modern technology. The company continuously analyses risks and critical components in processes, using the best technology available. As a follow-up, the company checks and updates internal work procedures.

The principles and procedures of occupational health and safety requirements are set out in the internal regulations of SPP, which are compiled in accordance with the general binding legal regulations of the Slovak Republic. The company makes sure employees are informed about these regulations and undergo training in occupational health and safety.

The Collective Agreement is binding on all contracting parties and on all employees of the employer performing work for the employer under an employment contract, except for employees classified as “inactive” (i.e. employees on maternity/parental/paternity leave, on unpaid leave, employees held in custody or employees released to discharge a public office), unless the Collective Agreement stipulates otherwise, and on employees holding the post of a director.

The Human Resources Section, which falls under the purview of the SPP CEO, is responsible for creating and implementing the human resources management strategy and policies in respect of recruitment and selection, training, development, remuneration, performance management, workforce motivation and stabilisation, collective bargaining, internal communication towards employees in the field of human resources, the proposal and implementation of tools to support corporate culture development, and for the preparation and monitoring of the fulfilment of the company’s personnel cost plan.

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

SPP cooperates with its employees and employee representatives and listens to their opinions, whether through personal meetings, suggestions, workshops or surveys. Every employee may and should make suggestions that can contribute to improving any area of the employer’s activities, and is entitled to be heard.

In addition to personal evaluation of their performance and development, the company holds internal dialogue with employees in the form of regular opinion surveys conducted once every 2 to 3 years. Regular opinion surveys and the adoption of follow-up measures are key to a more effective work environment with positive benefits for SPP as an employer.

SPP also has employee representatives appointed to the Supervisory Board, constituting one third (1/3) of the members of the Supervisory Board. The Supervisory Board is the supreme control body of SPP, supervising the exercise of powers by the Board of Directors and the conduct of business activities.

In the interest of supporting a proactive approach and better sharing of information on measures and activities in managing sustainability topics, SPP established the Sustainability Working Group and the Diversity and Inclusion Working Group.

The Sustainability Working Group serves to promote an active approach to achieving SPP’s sustainability and better sharing of information on measures and activities of individual organisational units implemented in the interest of fulfilment of the SPP Sustainability Strategy 2050 and the Scopes for achieving SPP’s sustainability in general.

The Diversity and Inclusion Working Group serves to support an active approach in the support of diversity and inclusion and better sharing of information on measures and activities of individual organisational units implemented in the interest of fulfilment of the Scopes for achieving SPP’s sustainability in the field of diversity and inclusion support.

As part of standard planning processes, SPP regularly allocates adequate funds in the annually compiled Business Plan for measures aimed at engaging its employees and employee representatives with regard to impacts. The measures listed above did not require any material capital expenditures, operating expenses, or other financial resources during the reporting period. SPP presently does not register any financial resources broken down to individual measures.

More information on keeping records and handling employee complaints is found in section ESRS G1-3 Prevention and detection of corruption and bribery.

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

SPP takes preventive actions against negative impacts on its employees. At the same time, it identifies negative impacts by involving the employees and creating an environment where it is possible for them to express their opinions freely and without fear. As part of procedures for identifying and assessing material impacts, the company did not identify any material negative impacts within its own workforce. Channels for expressing concerns are available to all employees of SPP, SPP CZ and SPP CNG.

SPP has a procedure in place for employees to raise concerns by reviewing any reports of violations of the rules and principles set out in the SPP Code of Conduct, as well as reports relating to any anti-social activity. These procedures cover anti-social activities as defined in Act No. 54/2019 Coll. on the protection of whistleblowers of anti-social activity, amending and supplementing certain acts, as well as any violation of the rules and principles set out in the SPP Code of Conduct.

At any time, employees, members of statutory bodies of SPP and its subsidiaries, contractual partners, as well as other third parties, may file a complaint about violation of ethical principles set out in the SPP Code of Conduct. More information on the process of reporting and handling complaints is found in Chapter 20 of ESRS G1, G1-3 Prevention and detection of corruption and bribery.

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

Respect for freedom and equality regardless of any status or gender, respect for differences between us (diversity) and promotion of a respectful and safe work environment for all (inclusion) form part of the SPP's values set out in the SPP Code of Conduct. That is also why SPP is one of the signatories of the Diversity Charter Slovakia. It is a voluntary initiative by companies and organisations, set up to promote diversity and inclusion in the workplace.

The highest body responsible for adopting measures is the SPP Board of Directors. Following the task assigned by the SPP Board of Directors – to develop SPP's activities in the field of diversity and inclusion – the company has issued internal Guidelines for Respectful Communication in SPP, which describes the importance of respectful communication, with examples and practical tips, including examples of communication (even when unintentional) that may be hurtful.

In the survey of opinions in SPP, conducted by the Human Resources Section in 2023, the vast majority of employees agreed that supporting diversity, equality and inclusion in SPP should be one of the areas of focus for SPP. As a follow-

up to findings established by the survey, SPP created a working group covering the area of diversity, equity/equality, and inclusion.

Its aim is to identify relevant challenges and topics within the SPP, propose specific measures to create a safe and respectful working environment that supports diversity, and to oversee their implementation, as well as other measures to create an environment in which we would all feel a little better. The working group comprises several organisational units – the Regulation and Compliance Section, the Human Resources Section, the Corporate Communication Section, and the Marketing Section. The group is open to more members, if interested to join.

The success of SPP also depends on the environment in which we work. SPP supports development and career growth, equal opportunities, and a safe environment for all colleagues without discrimination. SPP employees can send ideas and improvement suggestions concerning diversity and inclusion to the Compliance Manager.

The SPP Sustainability Strategy 2050 also includes a Plan for Supporting Diversity and Inclusion in SPP, not only in internal processes in the work environment (remuneration, education, benefits, etc.), but also in internal and external communication and projects supported by the SPP Foundation and Ekofond SPP.

As part of standard planning processes, SPP regularly allocates adequate resources in the annually compiled Business Plan for measures

related to material impacts on its own workforce and approaches to mitigating material risks and pursuing material opportunities related to its own workforce, and the effectiveness of those measures. The measures listed above did not require any material capital expenditures, operating expenses, or other financial resources during the reporting period. SPP presently does not register any financial resources broken down to individual measures.

More information on measures and approaches is provided in section S1-1 Policies related to own workforce and S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities.

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

The basic goal of SPP is to maintain a high level of care for SPP employees. Continuous support for everyone without discrimination strengthens the feeling of safety at work and allows for creating an environment that supports better work performance (employees who worry about how they are received by their surroundings do not feel safe, which is fundamentally contrary to the interests of the employer as they cannot fully concentrate on work).

One means is to maintain a high level of social dialogue with representatives of trade unions, investments in employee education and development in SPP and taking measures to support diversity and inclusion, promote equal opportunities and create a safe working environment aimed at achieving an inclusive environment supporting diversity among SPP employees and in relation to customers, as well as within SPP's internal and external communication.

Despite the overall ratio between women and men employed in SPP (approximately 65% to 35%), the ratio between women and men in managerial positions has long been disproportionate to the overall ratio between women to men employed in SPP.

The results of the "Equal opportunities for men and women" opinion survey and workshops held with managers on this topic show that it is necessary to focus on activities to create conditions and support for women in management in order to remove existing barriers, cultural stereotypes, and prejudices that influence women when deciding whether to apply for a managerial position. Key measures to increase the representation of women will therefore include recurring activities aimed at removing barriers and gradually increasing the representation of women in management by 2026.

S1-6 Characteristics of the undertaking's employees

The number of persons employed in SPP, SPP CZ and SPP CNG reached 795 as of 31 December 2024. The number of employed persons does not correspond to the data provided in the Consolidated Financial Statements of SPP, section Notes to the Consolidated Financial Statements, point 1. 3. Employees, as the numbers of employed persons are based on different time periods. The figure provided in the Consolidated Financial Statements of SPP takes into account the average recalculated number and the figure in the sustainability information takes into

account the actual records as of 31 December 2024. At the same time, the information in the Consolidated Financial Statements of SPP does not take into account persons employed in SPP CNG (10 persons in total).

In 2024, SPP employed 748 persons, of whom 486 were women and 262 were men. The number of employed persons corresponds with the information provided in the Individual Financial Statements of SPP, section Notes to the Individual Financial Statements, point 1. 3. Employees.

SPP reports the number of employees without breaking them down into geographical areas

Table 20 – Total number of persons employed by different types of employment in 2024

	Men	Women	Other*	Undisclosed	TOTAL
SPP	262	486	0	0	748
SPP CZ	24	13	0	0	37
SPP CNG	5	5	0	0	10

* Gender as stated by employed persons themselves.

Table 21 – Presentation of information on employed persons by type of contract broken down by region (number of persons or full-time equivalent)

	SPP	SPP CZ	SPP CNG
Number of employees (number of employees/full-time equivalent)	748	37	10
Number of permanent employees (number of employees/full-time equivalent)	645	25	10
Number of temporary employees (number of employees/full-time equivalent)	103	12	0
Number of employees with a non-guaranteed number of hours (number of employees/full-time equivalent)	0	0	0
Number of full-time employees (number of employees/full-time equivalent)	747	35	10
Number of part-time employees (number of employees/full-time equivalent)	1	2	0

since SPP does not employ more than 50 employees in any other geographical area.

The total number of permanent employees of SPP is 645, of whom 234 are men and 411 are women. The total number of temporary employees of SPP is 103, of whom 28 are men and 75 are women. In 2024, SPP did not employ any employees for a non-guaranteed number of hours. The numbers are given in the headcount (HC). The numbers are given as of the end of the reporting period, i.e. as of 31 December 2024. Gender is reported as stated by employed persons themselves. The data are compiled using the employee census methodology based on internal SPP records and registers.

An SPP employee is considered to be an employee with a valid employment contract (excluding employees on maternity, parental, or paternity leave) and does not include members of the Board of Directors and Supervisory Board.

An employee who has an employment contract concluded for an indefinite period is considered a permanent employee. An employee who has an employment contract concluded for a fixed period is considered a temporary employee.

Table 22 – Total number of persons employed by different types of employment broken down by gender in 2024

		Men	Women	Other*	Undisclosed	TOTAL
Number of employed persons/full-time equivalent	SPP	262	486	0	0	748
	SPP CZ	24	13	0	0	37
	SPP CNG	5	5	0	0	10
Number of permanently employed persons (number of persons/full-time equivalent)	SPP	234	411	0	0	645
	SPP CZ	12	13	0	0	25
	SPP CNG	5	5	0	0	10
Number of temporarily employed persons (number of persons/full-time equivalent)	SPP	28	75	0	0	103
	SPP CZ	8	4	0	0	12
		0	0	0	0	0
Number of persons employed for a non-guaranteed number of hours (number of persons/full-time equivalent)	SPP	0	0	0	0	0
	SPP CZ	0	0	0	0	0
	SPP CNG	0	0	0	0	0
Number of full-time employed persons (number of persons/full-time equivalent)	SPP	261	486	0	0	747
	SPP CZ	24	11	0	0	35
	SPP CNG	5	5	0	0	10
Number of persons employed part-time (number of people/full-time equivalent)	SPP	1	0	0	0	1
	SPP CZ	1	1	0	0	2
		0	0	0	0	0

* Gender as stated by employed persons themselves.

Employee turnover

In 2024, 97 employment terminations were registered in SPP, of which 45 were voluntary terminations by employees themselves and 52 were involuntary terminations by the employer. The overall turnover rate, including voluntary and involuntary terminations, came to 12.95%. The turnover rate with voluntary terminations stood at 6.01%. In SPP CZ, there were 16 employment terminations registered in 2024, of which 2 were voluntary terminations by employees themselves, 1 was an involuntary termination by the employer,

and 13 terminations were by agreement. In SPP CNG, there were 2 registered terminations of employment during the probationary period, 1 voluntary termination by the employee and 1 involuntary termination by the employer.

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

The number of persons employed in SPP who were non-employee workers at the end of 2024 was 20.

Table 23 – Number of persons employed who were non-employee workers at the end of 2024

	SPP	SPP CZ	SPP CNG
Self-employed persons	0	0	0
People provided by a third party who are primarily engaged in employment activities	0	0	0
Other	20	9	0
Total	20	9	0

Table 24 – Reporting on collective bargaining coverage and social dialogue

Coverage of employees by collective bargaining			Social dialogue with employees
Coverage rate	Employees – EEA	Employees – outside the EEA	Representation at the workplace (EEA only)
	(for countries with > 50 employees, representing > 10% of total employees)	(estimate for regions with > 50 employees, representing > 10% of total employees)	(for countries with > 50 employees, representing > 10% of total employees)
0 – 19%			
20 – 39%			
40 – 59%			
60 – 79%			
80 – 100%	96.7%		

SPP CZ and SPP CNG are not included in the table as the number of persons employed by them is lower than 50.

In 2024, these persons performed primarily intermittent, occasional administrative work based on an agreement on work performed outside of employment or via temporarily assigned employees. These also included 4 students doing their internships under part-time work agreements for students. A total of 9 persons worked at SPP CZ based on an agreement on work performed outside of employment. As of 31 December 2024, SPP CNG did not employ any persons based on an agreement on work performed outside of employment. The numbers are given in the headcount (HC). The numbers are given as of the end of the reporting period.

S1-8 Collective bargaining coverage and social dialogue

Relations between SPP and employees are regulated by the Collective Agreement ("CA"), which applies to 96.7% of persons employed in SPP, i.e. 723 persons. The Collective Agreement does not apply to persons in managerial positions and to certain special groups (i.e. employees on maternity leave, parental leave, or paternity leave, on unpaid leave, persons held in custody or persons who were released to discharge of a public office).

The Collective Agreement regulates the mutual rights and obligations of the employer and the trade union organisation operating at the employer, as well as the social, wage and other entitlements of employees. Among others, SPP provides its employees with the following benefits:

- 37.5 working hours per week, flexible working hours, and working from home;
- Contribution to supplementary pension insurance, contribution to meals from the social fund, contribution for recuperation, health care, sports and culture, support in emergency situations, financial contribution in the event of a difficult life situation and preventive medical examinations beyond that required by the law;
- Target bonus, Christmas bonus and work jubilee bonuses;
- Vacation and other days off beyond that required by the law;
- Contribution for a preschool facility operated at the SPP site in Bratislava.

At the end of 2024, SPP concluded the new Collective Agreement with the Gas Trade Unions for the period of 2025-2026. SPP does not have a Collective Agreement concluded beyond the EEA. SPP does not have any employees in EEA countries represented by an employee representative. SPP does not have any agreement with employees on representation by the European Works Council (EWC), the Societas Europaea (SE) works council, or the Societas Cooperativa Europaea (SCE) works council.

S1-9 Diversity metrics

SPP has 5 employees at the highest management level, comprising no women and 5 men. The positions of CEO and division directors are considered top management.

Table 25 – Age structure of persons employed as of 31 December 2024

Age		No.	Share
30 or younger	SPP	43	5.75%
	SPP CZ	8	21.62%
	SPP CNG	0	0%
31 – 40	SPP	149	19.92%
	SPP CZ	17	45.95%
	SPP CNG	1	10%
41 – 50	SPP	276	36.90%
	SPP CZ	11	29.73%
	SPP CNG	4	40%
older than 50	SPP	280	37.43%
	SPP CZ	1	2.70%
	SPP CNG	5	50%

The average age of persons employed in SPP as of 31 December 2024 was 46.33 years of age.

Table 26 – Employee qualification structure as of 31 December 2024

Education		No.	Share
basic education	SPP	1	0.13%
	SPP CZ	0	0%
	SPP CNG	0	0%
secondary vocational education	SPP	14	1.87%
	SPP CZ	4	10.81%
	SPP CNG	0	0%
complete secondary education with leaving exam	SPP	279	37.30%
	SPP CZ	16	43.24%
	SPP CNG	5	50%
university degree	SPP	454	60.70%
	SPP CZ	17	45.95%
	SPP CNG	5	50%

Table 27 – Structure of persons employed at individual management levels (%)

		Top management		Middle management		Lower management		Administration		Other positions	
		Men	Women	Men	Women	Men	Women	Men	Women	Men	Women
30 or younger	SPP	0	0	0	0	0	0	2	4	0	0
	SPP CZ	0	0	0	0	0	0	25	0	20	30
	SPP CNG	0	0	0	0	0	0	0	0	0	0
30 – 50	SPP	60	0	55	5	43	24	19	38	35	10
	SPP CZ	83	0	100	0	83	17	17	58	50	10
	SPP CNG	0	0	0	0	0	0	25	75	100	0
older than 50	SPP	40	0	25	15	21	12	9	28	40	15
	SPP CZ	17	0	0	0	0	0	0	0	0	0
	SPP CNG	0	0	0	0	0	0	0	100	100	0

S1-10 Adequate wages

All SPP employees are paid adequate wages. The remuneration rules in SPP represent a complex system that determines how employees are remunerated for their work. They constitute an important tool that ensures transparency, fairness, and motivation of employees.

The remuneration system is based on the principle of internal justice – internal balance in relation to the value of a job position, competitiveness on the labour market, and an individual's performance.

Employee remuneration consists of a basic salary, a variable salary component (non-guaranteed rewards, bonuses, or extraordinary bonuses, extraordinary rewards, bonuses pursuant to the applicable Collective Agreement, etc., related to the individual's performance), statutory bonuses (wage benefits for overtime work, for night work, for work on public holidays, remuneration for on-call work) and benefits – monetary and

non-monetary benefits provided to employees in accordance with internal regulations and the Collective Agreement.

In the SPP, job positions are classified into wage levels based on the assessment of difficulty of their job descriptions. For each wage level, a minimum and a maximum are set, i.e. the so-called wage band. These bands are used to determine an employee's base salary. Wage levels form part of the Collective Agreement and are updated in accordance with the conditions agreed in the Collective Agreement.

Remuneration of the highest management body

With regard to the fact that SPP is a joint stock company wholly-owned by the state, the remuneration paid to the members of the Board of Directors and the Supervisory Board of SPP is governed by the Remuneration Rules for Members of the Board of Directors and the

Supervisory Board of SPP, in accordance with Resolutions of the Government of the Slovak Republic No. 159/2011 and No. 190/2017.

In accordance with the Remuneration Rules for Members of the Board of Directors and the Supervisory Board of SPP, the remuneration for the discharge of the office of a member of the SPP Board of Directors consists of three components – a fixed component, a component of economic significance, and a variable component. The fixed component and the component of economic significance are paid out monthly. The fixed remuneration component is calculated as follows:

- for the Chairman of the Board of Directors, twice the average monthly nominal wage in the Slovak Republic as per data of the Statistical Office of the Slovak Republic (the “Average Salary”),
- for the Vice Chairman of the Board of Directors, 1.75 times the Average Salary, and
- for a member of the Board of Directors, 1.5 times the Average Salary.

The component of economic significance is calculated as a multiple of the fixed component as per the conditions set out in the Remuneration Rules for Members of the Board of Directors and the Supervisory Board of SPP, which take into account the turnover, profitability of sales, and the number of persons employed in SPP.

In 2024, the fixed component multiple was set to 1.09. The variable remuneration component, which is paid once a year depending on the fulfilment of key indicators determined by the

sole shareholder of SPP, is set to a maximum of 50% of the sum of monthly remunerations for the discharge of office paid to a member of the SPP Board of Directors in the previous year. The key indicator is the economic performance of SPP established by the sole shareholder of SPP as a target for a specific year (for 2024, SPP’s economic performance is measured by the EBIT indicator).

In accordance with the Remuneration Rules for Members of the Board of Directors and the Supervisory Board of SPP, the remuneration for a member of the SPP Supervisory Board consists of a fixed component and a component of economic significance. The fixed component and the component of economic significance are paid out monthly.

The remuneration of the Board of Directors and the Supervisory Board of SPP CZ and managing directors of SPP CNG is set in accordance with the Remuneration Rules for the Members of the Board of Directors and Supervisory Board of SPP. However, internal rules stipulate that the monthly remuneration of a member of the Board of Directors or a member of the Supervisory Board of SPP CZ who is also employed in SPP or SPP CZ is reduced by 50%.

SPP CZ and SPP CNG have also introduced the evaluation of bodies of subsidiary companies based on the set corporate governance targets. These targets are a prerequisite for the evaluation of bodies of subsidiary companies and the evaluation serves as a tool to develop effective and appropriate development programmes for representatives in company bodies, as well

as a useful source of information for future appointment processes. The evaluation is performed by the Business Development and Management of Subsidiaries Division, respectively by the Management of Subsidiaries Section. The corporate governance targets do not affect financial remuneration.

S1-11 Social protection

SPP, SPP CNG, and SPP CZ apply the employer’s social policy to all employees, in accordance with applicable legal regulations. Other areas of labour-law, social, wage and other entitlements of SPP and SPP CNG employees are governed by the concluded Collective Agreement. SPP CZ does not have any Collective Agreement concluded.

S1-12 Persons with disabilities

At the end of 2024, SPP employed a total of 30 persons with disabilities, of whom 8 were men and 22 were women (in 2023 it was 24 persons). The above number represents more than 4% of SPP employees. At the end of 2024, SPP CZ did not employ any persons with disabilities. SPP CNG employed 2 persons with partial disability.

In accordance with the SPP Code of Conduct, SPP applies the principles of non-discrimination and hires employees based on their qualifications

for work, as per the principle of equal opportunities for all involved persons.

The company processes personal data of employees in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), and Act No. 18/2018 Coll. on the protection of personal data, amending and supplementing certain acts, as amended.

S1-13 Training and skills development metrics

SPP supports the development of employees by various training and development opportunities. Education promotes creativity and the ability to adapt to changes, which is key to maintaining competitiveness. In 2024, SPP continued to implement training activities in line with the needs of the company and its employees. The training was aimed not only at improving vocational and professional skills, but also personal and managerial development. Key topics, in which SPP employees advanced themselves, included the topic of diversity, inclusion and mental health.

Table 28 – Persons with disabilities employed in SPP in %

Data in %	30 or younger	30 – 50	Older than 50
Men	0.0	10.0	16.7
Women	0.0	33.3	40.0

Table 29 – Average length of completed SPP training courses by management levels in hours

Total average	Women	Men	Top	Middle management	Lower	Administration	Other positions
27	28	25	10	22	38	27	19

Types of training for SPP employees:

- Adaptation course for newly hired employees
- Training by external lecturers based on specific needs and the established training plan for the given year
- Internal training, sharing and exchange of information across organisational units
- Compulsory and periodic training resulting from legislation
- Development programmes for managers, talents
- Voluntary lectures for employees, and others

SPP employees received training either in person, online, or in a combined/hybrid form.

The average number of hours per employed person in SPP was more than 27 hours.

The percentage of SPP employees who participated in regular performance and career development evaluations was 98.6%.

The average number of hours per SPP CZ employee was approximately 24 hours. The average number of hours per SPP CNG employee was approximately 4 hours. The average numbers of hours for SPP CZ and SPP CNG employees were determined by estimation.

S1-14 Health and safety metrics

The occupational health and safety management systems apply to all employees of SPP (100%).

In addition to employee development and fair remuneration for employees, another important element is their occupational health and safety ("OHS"). The company regularly evaluates and checks hazards arising from the work process and the work environment, along with the identification, assessment and management of OHS risks, in accordance with legislation and internal regulations. The said activities are taken care of by a designated department and the Occupational Health and Safety Commission.

In accordance with applicable legislation, the company arranges supervision of its work environment and work conditions by using a contractual occupational health service. In the OHS field, SPP has an occupational health and safety management system in place, meeting the requirements of the international standard ISO 45001:2018, which applies to 383 persons in Bratislava. In 2024, SPP extended the certification of the occupational health and safety management system to also include the sites in Zvolen and Košice.

Considering the nature of SPP's activities, no work has been identified within the company

that would pose a risk of injury carrying serious health consequences. SPP improves prevention in the area of occupational health and safety by regularly informing and educating employees. Occupational accidents are regularly monitored and recorded. Nevertheless, considering the above, the number of occupational accidents is very low or zero.

In 2024, SPP, SPP CZ, and SPP CNG did not record any registered work-related accident, no cases of adverse work-related health conditions or any deaths due to adverse work-related health conditions associated with the work performed by their own workforce or other SPP employees. No extraordinary event was registered in SPP, SPP CZ, or SPP CNG in 2024 at the workplaces or facilities of SPP, which could endanger the life or health of any persons.

SPP, SPP CZ and SPP CNG have not registered any cases of occupational diseases or registered work accidents that are subject to legal restrictions related to data collection.

SPP, SPP CZ or SPP CNG do not register any lost days due to work-related accidents or deaths caused by work-related accidents, occupational diseases, or deaths due to occupational diseases.

S1-15 Work-life balance metrics

The company supports employees in taking maternity, parental, or paternity leave in accordance with applicable legislation. In line with the Labour Code, SPP provides maternity, parental, and paternity leave to all employees who request it and meet the conditions for taking it.

In 2024, 43 women and 8 men were on maternity or parental leave, of whom 18 women and 8 men applied for family leave in the course of the year. The majority of employees return to work after their maternity or parental leave has ended – this applied to 13 women (100%) and 6 men (100%) in 2024.

Information provided in this disclosure requirement does not include SPP CZ or SPP CNG, as it was assessed as insignificant given the number of employees.

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

Remuneration is based on fair pay for women and men, as shown by the balanced ratio between basic salaries and bonuses paid to women and men at individual management levels or in specific selected job positions. The overall gender pay gap is based on the comparison of average basic salaries using the number of women and men who were registered as our workforce as of 31 December of the given year.

The average gross hourly wage of men is €15.80. The average gross hourly wage of women is €10.20. The percentage difference in remuneration between men and women is 35.5%. This difference is mainly due to the different nature of the positions held by men and women in SPP.

The ratio of total annual remuneration of the highest paid individual to the median total annual

Table 30 – Pay gap (Average basic salary and bonuses, women : men)

Total pay gap*	Middle management	Lower management	Administration	Sales Manager	Trade Policy Specialist	Contact Centre Operator	Customer Centre Employee
0.64 : 1	1.06 : 1	0.92 : 1	1 : 1	0.93 : 1	1.08 : 1	0.99 : 1	1 : 1

Table 31 – Ratio between remuneration of the highest paid individual and median remuneration of remaining persons in 2024

The ratio between total annual remuneration of the highest paid individual to the median total annual remuneration of all persons remunerated by SPP	The ratio between the percentage increase of total annual remuneration of the highest paid individual and the median annual percentage increase of remuneration for all persons remunerated by SPP
11.20	1.26

remuneration of all persons remunerated by SPP (including members of statutory bodies but excluding the highest paid individual) was as follows in 2024.

This ratio takes into account the actual remuneration paid (without using the full-time equivalent for part-time work, since the number of part-time work contracts is negligible) and it may vary year-on-year due to the variable salary component policy. The highest paid individual is mostly remunerated by a variable salary component, depending on the success (profitability) resulting from completed commodity trades.

Information provided in this disclosure requirement does not include SPP CZ or SPP CNG, as it was assessed as insignificant given the number of employees.

S1-17 Incidents, complaints and severe human rights impacts

During 2024, there emerged no serious human rights issues or incidents in relation to our own workforce. SPP did not register any work incidents, incidents of discrimination, including harassment, complaints, or any serious impacts on human rights within its own workforce in 2024, and so also no associated significant fines, sanctions, or damages resulting from the previously mentioned.

As part of the whistleblowing system, SPP handled 13 complaints which were, however, related to other areas governed by the SPP Code of Conduct.

Information provided in this disclosure requirement does not include SPP CZ or SPP CNG, as it was assessed as insignificant given the number of employees.

10.10 ESRS S3 Affected communities

Identified impacts:

Human rights – PPI

Respecting and promoting civil and political rights in communities leads to building a positive and strong brand image, which produces also heightened interest among candidates for positions and support from the public at large. SPP supports civic initiatives both via the SPP Foundation and Ekofond SPP.

S3-1 Policies related to affected communities

In addition to the reliable supply of energy, energy-related services, and development projects in the interest of reducing greenhouse gas emissions, SPP considers both fair relations with customers and activities related to people, communities and the landscape, to be an extremely important part of responsible business.

In line with the policies set out in the SPP Code of Conduct, the company is committed to a responsible approach towards affected communities, focusing chiefly on protecting their economic, social, cultural, civic and political rights. These policies form part of a broader strategy to ensure sustainable and responsible business that respects the rights and needs of all affected communities. The SPP Code of Conduct is also binding on our subsidiary companies SPP CZ and SPP CNG.

SPP's business traditions mean a long-term commitment also when it comes to activities relating to social responsibility, philanthropy and sponsorship, which we implement mainly via long-term partnerships, especially in the following areas:

- protecting natural heritage and the environment,
- protecting cultural heritage,
- promoting culture and art,
- promoting education,
- supporting and developing communities and disadvantaged groups, and
- supporting sports.

SPP implements these activities either directly or through the SPP Foundation and Ekofond SPP. In Bratislava, the company operates the SPP Gallery and the Slovak Gas Museum. SPP supports community-benefit projects mainly through the SPP Foundation and Ekofond SPP, to which it provides support in the form of direct donations and the so-called assigned tax (2% of income tax).

The SPP Foundation and Ekofond SPP then transparently publish the supported projects on their websites. More information about the activities of the SPP Foundation and Ekofond SPP is found in Chapter 8, Social Responsibility.

As a wholly state-owned company, SPP pays dividends to the state budget, along with direct and indirect taxes and fees. At the same time, as a result of special measures to reduce the

impact of extraordinarily high energy prices on certain customer groups, particularly households, SPP receives compensation from the state budget to compensate for the difference between the wholesale price of gas and electricity and the capped price of gas and electricity at which it sells these energy types to customers.

In 2024, SPP paid/received the following amounts to/from the state budget:

Table 34 – Taxes and dividends paid to the state budget (data on cash basis) and compensation paid to SPP from the state budget (in € million)

Direct taxes (income tax and special levy)	45.2
Indirect taxes (VAT and excise duties on gas and electricity)	386.5
Dividends	290
Total	721.7
Compensation paid from the state budget to SPP as a result of capped prices for electricity and gas supply	437

S3-2 Processes for engaging with affected communities about impacts

SPP welcomes the active involvement of affected communities in processes related to our activities and their impacts, through dialogue with communities to obtain their opinions and comments on planned activities. At the same time, SPP includes community representatives in project planning and decision-making processes, thus making sure their needs and interests are taken into

account. SPP provides transparent, clear and comprehensible information on projects and their potential impacts so that communities can make informed decisions.

When preparing projects for the production of energy from RES (electricity production by wind farms or EBWRC aimed at waste processing and biomethane production), we proactively communicate with representatives of the local government of the location where the implementation of the given project is planned (e.g. in the case of projects such as wind energy or waste handling) in order to transparently inform all stakeholders about our intentions and to obtain feedback not only from local government, but also from the professional and lay public.

This includes various activities, such as organising visits to existing operations for members of municipal and city councils, presentations of our intentions at public and working meetings of these bodies, an extensive information campaign in national and regional media, direct marketing, participation in and provision of information about SPP's intentions at regional events intended for the public, educational activities aimed at schools, etc.

After this communication, SPP analyses and considers the comments received in the preparation of projects. When preparing projects, SPP also processes expert opinions and impact assessments and proposes compensatory measures for the needs of local communities. At the same time, SPP makes sure that the selected technologies

correspond with the best available technology (BAT). Subsequently, projects are subject to the standard permit process (environmental impact assessment - EIA,²⁰ zoning procedure, building permit, integrated pollution prevention and control – IPPC).

SPP provides truthful, comprehensive and timely information to state and public institutions (municipalities, cities, etc.). SPP undertakes to fulfil all obligations arising from the Constitution of the Slovak Republic and to respect laws and other generally binding legal regulations.

SPP does not tolerate any perpetration of anti-social activity and we refrain from actions that could lead to the employer's criminal liability in the meaning of generally binding legal regulations governing the criminal liability of legal entities. SPP does not offer, promise or provide any benefits to representatives of state or administrative bodies responsible for making decisions, in order to obtain an advantage or influence decision-making in favour of SPP.

SPP duly fulfils its tax and pay levy obligations, ensures the transparency of all financial operations, and contributes to economic growth and improvement of the country's standard of living. SPP systemically develops fair relations with the media, the third sector, and other stakeholders.

Information provided in this disclosure requirement does not include SPP CZ or SPP CNG, as it was assessed as insignificant.

²⁰ The process and outputs of this assessment are governed by Act No. 24/2006 Coll. on environmental impact assessment, amending certain acts.

10.11 ESRS S4 Consumers and end-users

Identified impacts:

Transparent communication – PPI

Transparency and clarity are key aspects when communicating about products and services offered by SPP to the public and its approximately 1.5 million customers. Open and clear presentation of information about products and services reduces the risk of any misunderstandings and improves customer satisfaction, trust and loyalty.

S4-1 Policies related to consumers and end-users

SPP is the largest supplier of energy (gas and electricity) in Slovakia, which it supplies to customers across all market segments and regions of Slovakia. Therefore, customer satisfaction is a priority for SPP. Transparency and clarity are the foundation of communication about the products and services offered by the company to the public.

The core policies regarding the protection of consumers and end users are stipulated by the legislation and regulatory framework in force in the Slovak Republic. Internal policies regarding consumers and end users form part of the SPP Code of Conduct. An honest and fair relationship with customers, taking into account their needs and interests, is a prerequisite for a successful and long-term business relationship. The rules and principles of SPP's customer orientation are also expressed

in our corporate values and applied to our relationships within SPP.

The company considers it a matter of course to purposefully meet the reasonable expectations and requirements of customers, to show initiative, and to assume personal responsibility. The customer relationships are based on discreetness and courtesy without any favouritism or discrimination. SPP is committed to using only legitimate business methods and deems customer information as confidential.

When concluding contracts with corporate customers, SPP performs a risk analysis to eliminate the risk of conflicts of interest or the risk of concluding a contract with a customer who could pose a risk to SPP. The company also performs an ongoing risk analysis of existing clients in the event of any indicator that suggests, for example, the risk of an unreasonable or non-standard SPP receivable.

More information about SPP customers is found in Chapter 10 of ESRS 2, section SBM-1 Strategy, business model and value chain. Information provided in this disclosure requirement does not include SPP CZ or SPP CNG, as it was assessed as insignificant.

S4-2 Processes for engaging with consumers and end-users about impacts

SPP collects customer feedback several times

a year in the form of the NPS (Net Promoters Score) index and usually once a year on a representative sample in the form of the CSI (Customer Satisfaction Index). In 2024, SPP continued to achieve a high satisfaction score of more than 85% in CSI, based on these surveys.

SPP communicates directly with customers through 20 SPP Customer Centres, the SPP Customer Hotline for households and the SPP Business Line for the corporate sector. SPP Customer Centres in Michalovce, Humenné, and Komárno were modernised in 2024. The SPP Customer Centre in Žilina was moved to a shopping mall, greatly improving its accessibility.

The My SPP portal provides customers with easier and faster access to the company's services. SPP continuously innovates and deploys state-of-the-art technology, such as the automated processing of certain requests, as well as biometry. More than 255 000 customers have already registered their account on the My SPP portal.

SPP's communication on social networks underwent changes as well. In 2024, the company brought videos and interactive content with authentic presentation of SPP employees, who became the faces of the SPP brand.

The highest body responsible for engaging consumers and end users is the SPP Board of Directors. The effectiveness of consumer engagement processes is evaluated through various quantitative and qualitative indicators that are directly linked to business results, such as engagement rate, satisfaction, or sales.

Information provided in this disclosure requirement does not include SPP CZ or SPP CNG, as it was assessed as insignificant.

S4-3 Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

SPP regards accessibility, early identification, and the fastest possible correction or elimination of negative impacts to be key factors. Therefore, SPP uses multiple options allowing direct contact with customers in the interest of remedying negative impacts.

If a negative impact is associated with the provision of services, such as gas or electricity supply, the channels and mechanisms through which consumers and end users can notify SPP include foremost SPP Customer Centres (personal contact), the Customer Hotline for households (phone contact), SPP Business Line for the corporate sector (phone contact), our website www.spp.sk (online), the My SPP app (online), and also SPP's registry room (by letter).

SPP customers are informed about the possibility to file a complaint through the Instruction on Consumer Rights and the SPP Complaints Procedure on SPP's website. A customer has the right to complain, in particular, about the quality of the service provided, the reading of the designated meter, the billing of the service provided, the interruption or restriction of services, or other

identified errors related to the service provision by SPP. SPP keeps records of submitted complaints. SPP is obliged to issue a written document to the customer on how it handled the complaint no later than 30 days from the date the complaint was filed. Other conditions of the complaint procedure for SPP customers are also stipulated in the applicable Business Terms and Conditions.

The adherence to high standards of ethical conduct and zero tolerance of any form of anti-social activity set out in the SPP Code of Conduct form the basis of the functional setting of the whistleblowing system. This system serves as an effective tool for detecting any unfair practices, unethical behaviour, or actions both in internal and external relations of SPP. The complaint reporting system is also fully available to SPP customers.

A complaint can be submitted electronically by a message sent to the email address – compliance@spp.sk, by post in a written form to the address of SPP's registered office, or by filling out an online form. Details about the complaint reporting system are provided in the Information on Reviewing Reports and Complaints Relating to Anti-Social Activities and Violations of the SPP Code of Conduct, which is publicly available on the website www.spp.sk.

SPP determines the effectiveness of these channels and feedback from customer requests several times a year in the form of the NPS (Net Promoters Score) index and, usually once a year, on a representative sample in the form of the CSI (Customer Satisfaction Index).

Other options for remedying negative impacts are governed the legislative framework of the Slovak Republic. Pursuant to generally binding legal regulations regarding compliance with gas or electricity quality of supply standards, and in the event of failing to comply with quality of supply standards, SPP is obliged to pay compensations in the manner and in the amount stipulated by generally binding legal regulations.

Furthermore, consumers can report their concerns or needs in the form of complaints or concerns filed to the Regulatory Office for Network Industries, or via the Slovak Trade Inspection.

More information about SPP customers is provided in Chapter 10 of ESRS 2, section SBM-1 Strategy, business model and value chain. More information on complaints handling is provided in Chapter 20 of ESRS G1 Business conduct, section ESRS G1-1 Business conduct policies and corporate culture, and section ESRS G1-3 Prevention and detection of corruption and bribery.

Information provided in this disclosure requirement does not include SPP CZ or SPP CNG, as it was assessed as insignificant.

S4-4 Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions

The main measures of SPP focus on stable and secure energy supplies, the protection of consumers' personal data, and the provision of transparent information to consumers. SPP obtains personal data mainly from customers and strongly applies the principle of minimisation of processed data and strict compliance with legislation.

SPP only processes data that are necessary in connection with the performance of the contract for the supply of energy and services, if it is necessary to fulfil legal obligations, if customers have given their consent to the processing thereof, or if the processing thereof is a legitimate interest of SPP. SPP mainly focuses on preventing significant negative impacts on consumers by assessing the risks associated with the processing of personal data, adopting technical and organisational measures to ensure the protection of personal data, and regular reviews of these measures.

SPP has implemented comprehensive processes and measures to ensure protection of the personal data of SPP's customers. The principles

and policies of personal data processing are governed by internal regulations in accordance with the requirements for personal data protection under the General Data Protection Regulation (GDPR).

Measures and tasks in respect of managing personal data processing and protection are performed in SPP by the Regulation and Compliance Section, primarily through a person responsible for personal data protection (Data Protection Officer – DPO) who is the Director of the Regulation and Compliance Section, as well as through other employees of the Regulation and Compliance Section. The DPO informs the Board of Directors annually about the status of personal data protection via the Report on Personal Data Protection.

The area of personal data processing and protection in SPP is formalised and regulated by the internal regulation – SPP Directive "Personal data protection policy in Slovenský plynárenský priemysel, a.s.", which describes the principles of personal data processing and protection and establishes the scope of powers of the CR Section and other organisational units of SPP in personal data processing. The company also issued a document for all employees – "Guidelines of Slovenský plynárenský priemysel, a.s. for personal data processing", available on the SPP intranet and provided to all newly-hired employees.

The raising of employee awareness of risks and their obligations in relation to personal data protection and the exercise of controls and provision of information to the management

is yet another important component. In connection with the formalised rules and obligations of SPP employees in the field of personal data processing and protection, the Regulation and Compliance Section also provides continuous employee training in the form of e-learning and, if necessary, in the form of personal workshops focusing on specific topics.

The e-learning training takes place every 3 years and the last time all employees were required to complete the training was in 2022. New employees complete the aforementioned training upon joining the company. SPP has also adopted internal regulations – the Archival Rules and the Registry Rules – including the Registry Plan, which define the rules for storing and disposing of personal data contained in documents.

During 2024, SPP did not register any serious violations of the rules of personal data processing and protection or any serious incidents involving personal data protection violations.

Another key area concerns preventing the legalisation of proceeds from criminal activities (anti-money laundering – AML), which is overseen by the competent person, with the preparation and submission of the regular annual Report on the Fulfilment of AML Obligations to the SPP Board of Directors.

Internal regulations also regulate the prevention and management of incidents and security management. The main goals and procedure

in risk management aimed at preventing disruptions and outages of information systems are defined in the Information and Cyber Security Strategy. Internal regulations likewise establish procedures for detecting, evaluating, and responding to specific incidents based on the event type. The area of cybersecurity and providing the continuity and quality of supply to our customers is managed by the Cybersecurity Manager, who annually informs the SPP Board of Directors about any registered security incidents via the Cybersecurity Status Report.

SPP is the operator of the essential service for gas supply and electricity supply activities, being registered in the register maintained by the National Security Authority. SPP regularly undergoes an independent cybersecurity audit and conducts internal cybersecurity training annually. Every year, the SPP Board of Directors evaluates the Cybersecurity Status Report, which contains information on registered security incidents.

SPP did not register any serious cybersecurity incident in 2024.

The transparent and responsible provision of information to consumers about services and products is crucial for SPP. Through its customer service and regular surveys focused on customer needs and satisfaction, SPP makes sure their requests are dealt with, thereby ensuring the protection of consumer rights.

As part of its marketing communication, SPP complies with the rules of the SPP Code of Conduct and undertakes to provide

timely, complete, undistorted, truthful, and understandable information about its products and services and, at the same time, SPP does not disseminate any untruths, concealments, or exaggerations in advertisements or other public appearances. Clear and transparent communication is provided also in relation to information about the price of SPP's services and products. SPP regularly publishes price lists, business terms and conditions of supply and relevant market information, in accordance with the applicable legislation. SPP monitors the effectiveness of implemented measures and initiatives by measuring customer parameters and feedback, e.g. via NPS or CSI indicators.

The measures listed above did not require any material capital expenditures, operating expenses, or other financial resources during the reporting period. SPP presently does not register any financial resources broken down to individual measures.

Information provided in this disclosure requirement does not include SPP CZ or SPP CNG, as it was assessed as insignificant.

S4-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Within the framework of SPP's company-wide targets, one of the priorities is to achieve customer satisfaction in the households

segment and in the small customers and organisations segment at the level of 79 points when measured by the Customer Satisfaction Index (CSI) on a sample of at least 1000 customers.

The CSI is calculated from the results of a customer satisfaction survey, which we conduct regularly once a year on a representative sample of customers and which measures customer satisfaction in 6 areas: 1. Information and communication, 2. Prices, 3. Invoicing, 4. Personnel, 5. Products and services, 6. Reliability of supply.

We perceive the expression of customer satisfaction as a quantity that has a fundamental impact on the achieved economic results of SPP by its impact on the size of our customer base. At the same time, it is a quantity correlated with the functioning of the company's internal processes. Regardless of the position they work at, all SPP employees can positively influence customer satisfaction, thereby fulfilling the basic attribute of its use as a company-wide KPI.

Information provided in this disclosure requirement does not include SPP CZ or SPP CNG, as it was assessed as insignificant.

10.12 ESRS G1 Business conduct

Identified risks and opportunities:

Corporate governance – O

We consider corporate culture an opportunity to positively influence the company's financial performance. A positive culture that is aligned with the company's values and goals can lead to higher profitability, growth, and value for the shareholder.

- we are professional, and
- we are interested in our customer.

SPP has policies in place related to business conduct and corporate culture. Ethical principles and core values form part of the SPP Compliance Programme as a comprehensive regulation in the field of corporate governance.

Identified impacts:

Corporate governance – PPI

Corporate governance is important for SPP because it ensures effective management and control over the company, which improves its stability and credibility. Good governance practices promote transparency and accountability, reducing the risk of corruption or unethical behaviour.

The SPP Code of Conduct expresses the attitudes and standards of behaviour required of employees and contractual partners. Its goal is to support the creation of a fair, transparent, and competitive environment, the application of ethical principles, and the development of corporate culture. The SPP Code of Conduct regulates the fight against corruption, conflicts of interest, competition, and relations with and between persons employed in SPP, as well as relations with suppliers and public institutions.

G1-1 Business conduct policies and corporate culture

Responsible business is a prerequisite for long-term success and the trust in SPP by our customers. However, it also involves the introduction of ethical principles and core values towards all parties in work and business relationships in the field of corporate governance.

The core corporate values of SPP are:

- we are partners,
- we are efficient,
- we are proactive,

The SPP Code of Conduct is based on core values and is binding on all members of the statutory and supervisory bodies, the management, employees, and contractual partners of SPP. The SPP Code of Conduct is available online on our website and also applies to SPP CZ and SPP CNG subsidiaries. SPP conducts regular training in the SPP Code of Conduct for employees and members of management bodies, which are attended by all employees and members of management bodies.

In the field of corporate governance, SPP accounts for the recommendations of the Organisation for Economic Cooperation and Development (OECD) and proceeds in accordance with the Code of Corporate Governance for State-Owned Companies in Slovakia.

As part of standard planning processes, SPP regularly allocates adequate funds for measures related to the business conduct and corporate culture policy in the annually compiled Business Plan. These measures did not any require significant capital expenditures, operating expenses, or other financial resources during the reporting period.

More information on the assessment of corporate culture is found in section ESRS S1-2 Processes for engaging with own workers and workers' representatives about impacts.

G1-2 Management of relationships with suppliers

SPP has policies in place to prevent late payments. The internal regulation establishes a uniform procedure for processing payments, including determination of responsibilities of respective departments and employees in the payment processing process (creation of debit and transfer orders, execution of these payments via the module and E-banking, as well as procedural guidance when processing bank statements, SIPO payment files, and U and E type postal order files). The internal regulation applies to and is binding on all SPP employees who

participate in the execution of the payments in question.

More detailed information on the supply chain related to securing gas and electricity supply is provided in section SBM-1 Strategy, business model and value chain. In addition to gas, electricity, and network services related to safeguarding their supply to customers, SPP also procures other goods, works, and services. Domestic suppliers are markedly involved in their supply (we consider a domestic supplier to be a supplier with a place of business in Slovakia, including multinational companies that have their business representations in the Slovak Republic).

The supply chain is therefore an important area with an impact on the overall sustainability of SPP. Given the above, one of the measures to achieve SPP sustainability is to oversee the sustainability of SPP's business partners within our supply chain. Adherence to ethical principles and core values that SPP publicly declares, the monitoring of any non-compliance, and taking corrective measures, are key aspects of SPP's credibility towards business partners. For this reason, one of SPP's targets is to introduce and assess by 2026 the sustainability standards within SPP's supply chain and, at the same time, to prefer green procurement principles in the procurement of goods/services/construction work in SPP.

The information provided in this disclosure requirement does not include SPP CZ or SPP CNG as it was assessed as insignificant.

G1-3 Prevention and detection of corruption and bribery

The SPP Code of Conduct defines a clear commitment to zero tolerance to any form of corrupt behaviour and a commitment to avoid all activities that hint of any corruption. Procedures for preventing, detecting, and resolving any suspected corruption or bribery form part of the SPP Compliance Programme and comprehensive corporate governance regulations.

The SPP Compliance Program consists of the SPP Code of Conduct, the Compliance Programme Directive, the Directive "Reviewing Notifications and Complaints Regarding Anti-Social Activities and Violations of the Rules and Principles of Responsible Conduct", the Compliance Manager Statute, and other Compliance Manager tools.

The internal rules further regulate the area of combating money laundering. The SPP Group does not distinguish specific risk positions with regard to preventing corruption and bribery, and the principles set out in the SPP Code of Conduct and the Compliance Programme Directive are binding on all members of the statutory and supervisory bodies, the management, and employees of SPP, as well as the subsidiaries SPP CZ and SPP CNG.

The area of compliance, as well as the area of corporate governance, prevention of anti-social activities and violations of ethical principles, supervision of personal data protection and sustainability areas, is internally covered by the Regulation and Compliance Section, which is

managed by the Compliance Manager. The SPP Compliance Program also includes a unified system for reporting concerns regarding anti-social activities and the rules and principles defined in the SPP Code of Conduct. SPP accepts anonymous and non-anonymous complaints, regardless of whether the whistleblower is our employee or not, and regardless of the form, in which they are submitted.

The Compliance Manager is required to accept and review each notification and complaint within 90 days of its receipt; this period may be extended by an additional 30 days. When reviewing a report or complaint, the Compliance Manager is authorised to require maximum cooperation from all persons involved and to require access to electronic and other forms of documentation and information serving to solve the notification or complaint. If the notification or complaint is not anonymous, the Compliance Manager informs the whistleblower in writing of the result of the review within 10 days of finishing his/her review of the notification or complaint. The Compliance Manager keeps records on notifications and complaints and the results of their review, in line with legal regulations.

When reviewing a complaint, the Compliance Manager and members of the review team maintain confidentiality regarding the identity of the whistleblower and the information provided. The confidentiality obligation regarding the identity of the whistleblower and the information provided is included in the employment contract of the Compliance Manager and members of the review team. The Compliance Manager is not authorised to disclose the identity of the

whistleblower, except in cases established by legal regulations. At the same time, whistleblowers are provided with protection in full accordance with Act No. 54/2019 Coll. on the protection of whistleblowers of anti-social activities.

SPP has a clear and timely escalation and communication procedure in place to ensure that all complaints and concerns are reported, reviewed and, ultimately, forwarded to the applicable management organisational unit or to SPP's management. In the case of a legal obligation, the Compliance Manager reports non-compliance to the respective regulatory authority, in accordance with applicable regulations. In the most serious cases of confirmed violations of the SPP Code of Conduct, the Compliance Manager immediately informs the SPP Board of Directors, along with measures that have been or are to be adopted by the respective organisational units.

The educational and training system provided by the Compliance Manager was created as part of the Compliance Programme. The aim of this training system is to make sure that information is provided to employees and persons working under other contracts or agreements to properly fulfil their duties. Each employee is required to complete initial training (on the day of joining the company), special retraining (in the event of any fundamental change to legal regulations related to and/or affecting the activity or based on monitoring and reporting), and training within individual organisational units (relating to specific activities within individual organisational units, being "tailor-made" for their needs and being prepared in cooperation with the concerned organisational unit).

Periodic employee retraining is performed by the Compliance Manager in accordance with the schedule established by him/her, at least once every three years. The online training "Compliance Programme in the SPP Group" is mandatory for all employees of SPP, SPP CZ and SPP CNG. Through this training, employees become familiarised with its purpose and basic issues governed by it. The training includes a final test required for its successful completion. Members of the review team and the Compliance Manager regularly participate in external educational activities.

In 2024, the company did not register any complaints relating to anti-social activities or any significant cases of non-compliance with laws or generally binding regulations. As part of the whistleblowing system, SPP reviewed 13 complaints and queries which, however, related to other areas governed by the SPP Code of Conduct. All employees, members of statutory and supervisory bodies, and the management are subject to equally strict requirements and rules related to the threat of corruption or bribery.

The Compliance Manager regularly informs the statutory bodies (at least once a year and, if necessary, also on an exceptional basis) about the results of his/her own activities through the Compliance Programme Management Report and, in the event of exceptionally serious circumstances, informs the CEO, the Board of Directors, or members of the statutory bodies of the company.

G1-4 P Confirmed incidents of corruption or bribery

The SPP Code of Conduct establishes a clear commitment to zero tolerance to any form of corrupt behaviour and a commitment to avoid any and all activities that hint of any corruption. SPP employees fill out a declaration of conflict of interest once a year and regularly undergo training in the SPP Compliance Programme, by which they become familiarised with the principles of preventing conflicts of interest and with the rules of combating corruption.

In 2024, SPP, SPP CZ, and SPP CNG did not register any case involving violation of anti-corruption or anti-bribery laws, lawsuits, or other cases of corruption or bribery. Supervision of compliance with SPP's internal regulations is performed by the internal audit, which regularly informs the Board of Directors about activities and based on its findings, prepares a plan of measures to eliminate identified deficiencies.

G1-5 Political influence and lobbying activities

In accordance with the SPP Code of Conduct, SPP does not fund any political parties or their candidates or representatives, whether in Slovakia or abroad, and neither funds any events aimed at political propaganda. SPP refrains from exerting any direct or indirect pressure on politicians, accepting any job recommendations, or consulting contracts. SPP does not provide contributions to organisations with which we

may have a conflict of interest (e.g. trade unions or consumer protection groups) or to organisations or individuals who do not respect the principles set out in the SPP Code of Conduct or whose actions could pose a threat to SPP's good will.

In 2024, SPP participated in the review proposals of several national legal regulations (laws and decrees), particularly regarding the power industry, regulation, environment, and permit processes.

SPP is registered in the EU Transparency Register under registration no. 560089848584-90.

SPP sees membership in chambers, unions and associations as an opportunity for discussion within or across sectors, including familiarisation with the opinions of our customers and promoting the common interests of members. In the exercise of its membership, SPP always ensures compliance with legal obligations, especially in connection with the protection of competition rules and the prohibition of agreements restricting competition. We regularly assess the benefits of our membership and flexibly terminate membership or establish new partnerships. In 2024, SPP was a member of the following organisations:

- American Chamber of Commerce in the Slovak Republic
- Association of Energy Service Providers, membership expired in the course of 2024
- CFO Club
- Circular Slovakia
- Energy Traders Europe
- Eurogas

- French-Slovak Chamber of Commerce, membership expired in the course of 2024
- HRCOMM
- Republican Union of Employers, membership expired in the course of 2024
- Slovak Compliance Circle
- Slovak Association of Financiers
- Slovak Association of Sustainable Energy (SAPI)
- Slovak Chamber of Commerce and Industry
- Slovak-German Chamber of Commerce and Industry
- Slovak Gas and Oil Association
- WindEurope
- Energy Suppliers Association, membership expired in the course of 2024
- Union of Power Industry Employers of Slovakia

The information provided in this disclosure requirement does not include SPP CZ or SPP CNG as it was assessed as insignificant.

G1-6 Payment practices

The standard maturity period of SPP liabilities set out in the General Terms and Conditions for the purchase of goods, services, work and construction work (does not include the purchase of electricity or gas commodities) or as agreed with the supplier, is 30 days from the invoice receipt date with the following specifics:

- at least 30 days from delivery of the invoice to SPP in respect of the delivery of goods, works, services, and investments;
- at least 21 days from delivery of the invoice to SPP in respect of orders not exceeding €5 000 excl. VAT;
- at least 14 days from delivery of the invoice to SPP in respect of the delivery of food.

In 2024, SPP placed the following numbers of orders:

- 1766 orders with a maturity period of 30 days (59% of the total number);
- 461 orders with a maturity period of 21 days (15.5% of the total number);
- 306 orders with a maturity period of 60 days (10% of the total number);
- 340 orders with a maturity period of 14 days (11.5% of the total number);
- 100 orders with a custom maturity period – usually shorter than 10 days (4% of the total number).

All business cases are recorded in the SAP ERP information system in the form of orders, which also include payment terms. Subsequently, the Payment Transactions Department executes the so-called payment runs in the SAP ERP IS on a daily basis. All documents are tax pre-verified by the tax department and entered to the SAP ERP IS by the accounting department.

SPP settles its liabilities within the above-mentioned standard maturity periods and does not register any late payments. In 2025, SPP will more thoroughly require its suppliers to submit invoices electronically in the form of e-invoices, instead of delivering paper invoices. More information is available in section ESRS G1-2 Management of relationships with suppliers.

Information provided in this disclosure requirement does not include SPP CZ or SPP CNG, as it was assessed as insignificant.

11 LIST OF ABBREVIATIONS

EBWRC	Energy and Biological Waste Recovery Centres
ČEZ	A group of companies controlled by ČEZ, a. s.
Ekofond SPP	A non-profit organisation Ekofond SPP, n.o., founded by SPP
ESCO Slovensko	ESCO Slovensko, a.s., and companies belonging to the ESCO Slovensko Group
EU	European Union
EU ETS	European Union Emissions Trading System
PVPP	Photovoltaic power plant
GHG Protocol	Greenhouse Gas Protocol – a corporate accounting and reporting standard issued by World Resources Institute (WRI) and World Business Council for Sustainable Development (WBCSD) organisations
GRI	Global Reporting Initiative
IPIECA	International Petroleum Industry Environmental Conservation Association – a non-profit organisation devoted to environmental protection in the gas and oil sector
IPCC	International Panel on Climate Change
CHP	High-efficiency combined heat and power plant
MoE SK	Ministry of Economy of the Slovak Republic

Commercial Code	Act No. 513/1991 Coll., the Commercial Code, as amended
UN	United Nations
RES	Renewable energy sources
Remuneration Rules for Members of the Board of Directors and the Supervisory Board of SPP	Remuneration rules for members of the Board of Directors and the Supervisory Board of SPP approved by the MoE's decision as the sole shareholder of SPP
Rules for Selecting SPP Bodies	Selection rules and general conditions for state representatives in the bodies of wholly or partially state-owned companies in accordance with Resolution of the Government of the Slovak Republic No. 159/2011, as amended
SDGs	Sustainable development goals
SPP Group	SPP, SPP CZ, SPP CNG, SPP Foundation, and Ekofond SPP
SPP	Slovenský plynárenský priemysel, a.s.
SPP CZ	SPP CZ, a.s., a subsidiary wholly-owned by SPP
SPP CNG	SPP CNG s. r. o., a subsidiary wholly-owned by SPP
SK/Slovakia	Slovak Republic
Labour Code	Act No. 311/2001 Coll., the Labour Code, as amended



Deloitte Audit s.r.o.
Pribinova 34
811 09 Bratislava
Slovak Republic

Tel: +421 2 582 49 111
deloitteSK@deloitteCE.com
www.deloitte.sk

Registered in the Business
Register of the City Court Bratislava III
Section Sro, File 4444/B
Company ID: 31 343 414
VAT ID: SK2020325516

Slovenský plynárenský priemysel, a.s.

A17F44D28BAF8A99FE117E0FF27D725D

INDEPENDENT AUDITOR'S REPORT

To the Shareholders, Supervisory Board and Board of Directors of Slovenský plynárenský priemysel, a.s. and the Audit Committee:

REPORT ON THE AUDIT OF THE SEPARATE FINANCIAL STATEMENTS

Opinion

We have audited the separate financial statements of Slovenský plynárenský priemysel, a.s. (the "Company"), which comprise the balance sheet as at 31 December 2024, and the income statement, the statement of comprehensive income, the statement of changes in equity and the statement of cash flows for the year then ended, and notes to the separate financial statements, including material accounting policy information and other explanatory information.

In our opinion, the accompanying separate financial statements give a true and fair view of the financial position of the Company as at 31 December 2024, and its financial performance and its cash flows for the year then ended in accordance with International Financial Reporting Standards as adopted by the European Union (EU).

Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing. Our responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the Separate Financial Statements* section of our report. We are independent of the Company in accordance with the provisions of Act No. 423/2015 Coll. on Statutory Audit and on Amendment to and Supplementation of Act No. 431/2002 Coll. on Accounting, as amended, as amended (hereinafter the "Act on Statutory Audit") related to independence and ethical requirements, including the Code of Ethics for Auditors that are relevant to our audit of the separate financial statements, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Other Matter

The separate financial statements of Slovenský plynárenský priemysel, a.s. for the year ended 31 December 2023 were audited by another auditor who expressed an unqualified opinion on the separate financial statements on 13 March 2024.

Responsibilities of Management and Those Charged with Governance for Separate the Financial Statements

Management is responsible for the preparation and fair presentation of the separate financial statements in accordance with International Financial Reporting Standards as adopted by the EU, and for such internal control as management determines is necessary to enable the preparation of separate financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the separate financial statements, management is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting, unless management either intends to liquidate the Company or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Company's financial reporting process.

Auditor's Responsibilities for the Audit of the Separate Financial Statements

Our objectives are to obtain reasonable assurance about whether the separate financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with International Standards on Auditing will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these separate financial statements.

This is a translation of the original auditor's report issued in the Slovak language to the accompanying financial statements translated into the English language.

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited ("DTTL"), its global network of member firms, and their related entities (collectively, the "Deloitte organization"). DTTL (also referred to as "Deloitte Global") and each of its member firms and related entities are legally separate and independent entities, which cannot obligate or bind each other in respect of third parties. DTTL and each DTTL member firm and related entity is liable only for its own acts and omissions, and not those of each other. DTTL does not provide services to clients. Please see www.deloitte.com/sk/en/about to learn more.

As part of an audit in accordance with International Standards on Auditing, we exercise professional judgment and maintain professional scepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the separate financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the separate financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the separate financial statements, including the disclosures, and whether the separate financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with those charged with governance about, inter alia, the planned scope and time schedule of the audit and significant audit findings, including all material deficiencies of internal control identified during our audit.

REPORT ON OTHER LEGAL AND REGULATORY REQUIREMENTS

Report on Information Disclosed in the Annual Report

The statutory body is responsible for information disclosed in the annual report prepared under the requirements of the Act on Accounting No. 431/2002 Coll. as amended (the "Act on Accounting"). Our opinion on the separate financial statements stated above does not apply to other information in the annual report.

In connection with the audit of separate financial statements, it is our responsibility to gain an understanding of the information disclosed in the annual report and assess whether such information is materially inconsistent with the separate financial statements or our knowledge of the entity and its position obtained in the audit of the separate financial statements, or otherwise appears to be materially misstated.

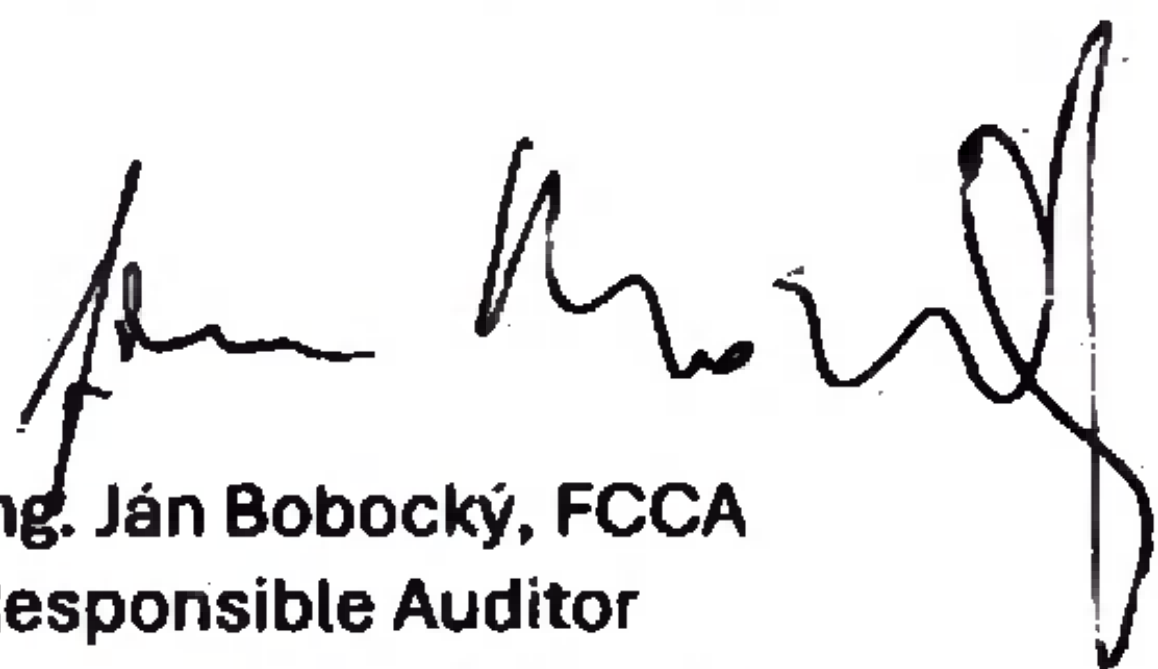
As at the issuance date of the auditor's report on the audit of separate financial statements, the annual report was not available to us.

When we obtain the annual report, we will assess whether the Company's annual report includes information whose disclosure is required under the Act on Accounting, and based on procedures performed during the audit of the separate financial statements, we will express an opinion on whether:

- Information disclosed in the annual report prepared for 2024 is consistent with the separate financial statements for the relevant year; and
- The annual report includes information pursuant to the Act on Accounting.

Furthermore, we will disclose whether material misstatements were identified in the annual report based on our understanding of the Company and its position, obtained in the audit of the separate financial statements.

Bratislava, 26 March 2025



Ing. Ján Bobocký, FCCA
Responsible Auditor
Licence UDVA No. 1043

On behalf of
Deloitte Audit s.r.o.
Licence SKAu No. 014



Deloitte Audit s.r.o.
Pribinova 34
811 09 Bratislava
Slovak Republic

Tel: +421 2 582 49 111
deloitteSK@deloitteCE.com
www.deloitte.sk

Registered in the Business
Register of the City Court Bratislava III
Section Sro, File 4444/B
Company ID: 31 343 414
VAT ID: SK2020325516

Slovenský plynárenský priemysel, a.s.

E084D2F75EF796B41DDDD15407280A77

INDEPENDENT AUDITOR’S REPORT

To the Shareholder, Supervisory Board and Board of Directors of Slovenský plynárenský priemysel, a.s. and the Audit Committee:

REPORT ON THE AUDIT OF THE CONSOLIDATED FINANCIAL STATEMENTS

Opinion

We have audited the consolidated financial statements of Slovenský plynárenský priemysel, a.s. and its subsidiaries (the “Group”), which comprise the consolidated balance sheet as at 31 December 2024, and the consolidated income statement, the consolidated statement of comprehensive income, the consolidated statement of changes in equity and the consolidated statement of cash flows for the year then ended, and notes to the consolidated financial statements, including material accounting policy information and other explanatory information.

In our opinion, the accompanying consolidated financial statements give a true and fair view of the consolidated financial position of the Group as at 31 December 2024, and its consolidated financial performance and its consolidated cash flows for the year then ended in accordance with International Financial Reporting Standards as adopted by the European Union (EU).

Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing. Our responsibilities under those standards are further described in the *Auditor’s Responsibilities for the Audit of the Consolidated Financial Statements* section of our report. We are independent of the Group in accordance with the provisions of Act No. 423/2015 Coll. on Statutory Audit and on Amendment to and Supplementation of Act No. 431/2002 Coll. on Accounting, as amended, as amended (hereinafter the “Act on Statutory Audit”) related to independence and ethical requirements, including the Code of Ethics for Auditors that are relevant to our audit of the consolidated financial statements, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Other Matter

The consolidated financial statements of Slovenský plynárenský priemysel, a.s. and its subsidiaries for the year ended 31 December 2023 were audited by another auditor who expressed an unqualified opinion on the consolidated financial statements on 13 March 2024.

Responsibilities of Management and Those Charged with Governance for the Financial Statements

Management is responsible for the preparation and fair presentation of the consolidated financial statements in accordance with International Financial Reporting Standards as adopted by the EU, and for such internal control as management determines is necessary to enable the preparation of consolidated financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the consolidated financial statements, management is responsible for assessing the Group’s ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting, unless management either intends to liquidate the Group or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Group’s financial reporting process.

Auditor’s Responsibilities for the Audit of the Consolidated Financial Statements

Our objectives are to obtain reasonable assurance about whether the consolidated financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor’s report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with International Standards on Auditing will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these consolidated financial statements.

This is a translation of the original auditor’s report issued in the Slovak language to the accompanying financial statements translated into the English language.

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited (“DTTL”), its global network of member firms, and their related entities (collectively, the “Deloitte organization”). DTTL (also referred to as “Deloitte Global”) and each of its member firms and related entities are legally separate and independent entities, which cannot obligate or bind each other in respect of third parties. DTTL and each DTTL member firm and related entity is liable only for its own acts and omissions, and not those of each other. DTTL does not provide services to clients. Please see www.deloitte.com/sk/en/about to learn more.

As part of an audit in accordance with International Standards on Auditing, we exercise professional judgment and maintain professional scepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the consolidated financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Group's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the consolidated financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Group to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the consolidated financial statements, including the disclosures, and whether the consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation.
- Plan and perform the group audit to obtain sufficient appropriate audit evidence regarding the financial information of the entities or business units within the Group as a basis for forming an opinion on the group financial statements. We are responsible for the direction, supervision and review of the audit work performed for purposes of the group audit. We remain solely responsible for our audit opinion.

We communicate with those charged with governance about, inter alia, the planned scope and time schedule of the audit and significant audit findings, including all material deficiencies of internal control identified during our audit.

REPORT ON OTHER LEGAL AND REGULATORY REQUIREMENTS

Report on Information Disclosed in the Consolidated Annual Report

The statutory body is responsible for information disclosed in the consolidated annual report prepared under the requirements of the Act on Accounting No. 431/2002 Coll. as amended (the "Act on Accounting"). Our opinion on the consolidated financial statements stated above does not apply to other information in the consolidated annual report.

In connection with the audit of consolidated financial statements, it is our responsibility to gain an understanding of the information disclosed in the consolidated annual report and assess whether such information is materially inconsistent with the consolidated financial statements or our knowledge of the group and its position obtained in the audit of the consolidated financial statements, or otherwise appears to be materially misstated.


As at the issuance date of the auditor's report on the audit of consolidated financial statements, the consolidated annual report was not available to us.

When we obtain the consolidated annual report, we will assess whether the Group's annual report includes information whose disclosure is required under the Act on Accounting, and based on procedures performed during the audit of the consolidated financial statements, we will express an opinion on whether:

- Information disclosed in the consolidated annual report prepared for 2024 is consistent with the consolidated financial statements for the relevant year; and
- The consolidated annual report includes information pursuant to the Act on Accounting.

Furthermore, we will disclose whether material misstatements were identified in the consolidated annual report based on our understanding of the Group and its position, obtained in the audit of the consolidated financial statements.

Bratislava, 26 March 2025



Ing. Ján Bobocký, FCCA
Responsible Auditor
Licence UDVA No. 1043

On behalf of
Deloitte Audit s.r.o.

12 CONTACTS

Slovenský plynárenský priemysel, a.s.

Mlynské nivy 44/a
825 11 Bratislava
Slovak Republic
Phone: +421 2 62 62 11 11
E-mail: spp@spp.sk
Website: www.spp.sk

HOUSEHOLDS

SPP Customer Care Line

Phone: 0850 111 363 (from 1 June 2020,
weekdays from 8 a.m. to 6 p.m.)
E-mail: zakaznickalinka@spp.sk
For calls from abroad or from networks of
alternative operators: +421 2 58 69 90 90

SMALL BUSINESSES & ORGANISATIONS

SPP Business Line

Phone: 0850 111 565 (from 1 June 2020,
weekdays from 8 a.m. to 6 p.m.)
E-mail: biznislinka@spp.sk
For calls from abroad or from networks of
alternative operators: +421 2 58 69 90 92

SPP Fair Hotline

Phone: 0800 126 076 (from 1 June 2020,
weekdays from 8 a.m. to 6 p.m.)

Please visit www.spp.sk website for the list of
SPP Customer Centres.

SLOVAK GAS MUSEUM

Slovenský plynárenský priemysel, a.s.
Mlynské nivy 44/c
825 11 Bratislava
Phone: +421 2 62 62 41 64, 0911 704 489
(weekdays from 10 a.m. to 2 p.m.)
E-mail: muzeum@spp.sk
Entry to the museum is free of charge. Visits
must be arranged in advance.

SPP GALLERY

Slovenský plynárenský priemysel, a.s.
Mlynské nivy 44/c
825 11 Bratislava
Phone: +421 2 62 62 42 42, 0911 704 489
(weekdays from 10 a.m. to 6 p.m.)
E-mail: galeria@spp.sk
Entry to the gallery is free of charge.

© Slovenský plynárenský priemysel, a.s., 2025

All rights reserved. Copying and distribution
of texts is allowed only with the permission
of Slovenský plynárenský priemysel, a.s.
Design: THIS IS LOCCO