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Consolidated Annual Report | **2025**



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# 1

# ABOUT SPP

SPP continues in the more than 165-year tradition of operating in the energy sector, and today the company is the largest energy supplier in Slovakia. It guarantees the reliable, secure and competitive supply of gas and electricity, together with auxiliary services, to around 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 the company's history, supplying gas continues to be very much at the core of its business. SPP is aware that in the interest of sustainability it is crucial to lower the consumption of all fossil fuels, including natural gas. Therefore, the company focuses new business investments 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, except 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. In the field of corporate responsibility and philanthropy, SPP implements its activities 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 "Annual Report") also refer to persons of feminine gender.

## Dear Ladies and Gentlemen,

The period of 2025 confirmed that SPP is well able to fulfil its role as a stable and reliable energy partner even in conditions of fundamental changes. Thanks to our long-term preparation, the diversification of gas sources and flexible use of transportation routes, in the past year we were fully prepared to handle the termination of gas transmission through Ukraine, which had been in operation for more than fifty years.

In 2025, we sourced natural gas via the southern route through Hungary, as well as via western routes from Germany through the Czech Republic and Austria. This meant that Russian gas accounted for approximately one third of total supplies in 2025, while the remainder came from our broad portfolio of diversified contracts concluded with major international suppliers. SPP has thus confirmed that it is not dependent on any single source or single transmission route, and that it is ready to respond to future developments in the energy market.

Diligent preparation for filling up our capacity in underground storage facilities in Slovakia was again a key element of energy security for our customers in 2025. Last year, we stored 17.8 TWh of gas in storage facilities before the start

of the heating season, representing more than half of the annual consumption in our portfolio. This was a contributing factor in assuring households and industry that supplies would be provided even during periods of increased demand.

We supplied nearly 30 TWh of gas and 3 TWh of electricity to end consumers and other customers in 2025. This means we have stabilised our share in gas supply at 60% while SPP's share in the electricity supply market reached 12%. We supplied electricity to 330 thousand points of supply and so managed to compensate almost 100% of historical losses in the field of gas supply and develop further our comprehensive range of energy services. Through our subsidiary SPP CZ, we supplied more than 6.5 TWh of gas and almost 1 TWh of electricity to customers in the Czech Republic.

With our new product Photovoltaics from SPP, we started providing our customers with the most advantageous all-in-one solution on the market, from a tailor-made assessment of the type and size, through professional installation and all related services. By combining the services of Photovoltaics from SPP and the Virtual Battery from SPP, we give customers the chance to fully utilise the opportunity to independently produce electricity from renewable sources at home. Moreover, in 2025 we continued to modernise our network of customer centres and, in the interest of improving the quality of services, we worked on implementing new digital solutions and artificial intelligence tools that help us streamline internal processes and improve the customer experience.

We also continued preparing projects for energy production from our own sources and new solutions in the energy sector. In 2025, we installed a battery solution with a 4 MW

output at our site in Spišská Belá, which we expect to be put into operation next year. We are also making progress in wind power generation projects, the implementation of which requires an active approach and cooperation with local governments and permit issuing authorities.

The operating profit of SPP amounted to €134 million in 2025 and the total profit after tax came to €238 million. We were able to seize opportunities in the energy market while maintaining competitive pricing and profitability. The significant optimisation of sourcing costs was achieved by constantly improving the 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 our positive financial results.

I would like to thank all those who contributed to our successes in 2025. I thank our customers for the trust they have shown in us even during this difficult period. I thank our business partners for their cooperation and flexibility, without which it would be impossible to ensure stable energy supplies. And a special thanks goes to the employees of SPP – for their expertise, commitment and responsible approach. They are the true foundation of our company's stability and success, proving that SPP is a strong and resilient company no matter how challenging the conditions.

**Ing. Martin Húska**

CEO and Member of the Board of Directors

# 3

## CORPORATE GOVERNANCE SYSTEM AND RESPONSIBLE BUSINESS

SPP is a process-managed company that has implemented a 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 and SPP Code for Suppliers, setting out our attitudes and the standards of behaviour required of 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, namely:

- (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 believe climate and environmental protection goals are only achievable 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.

The SPP Board of Directors also adopted a comprehensive Sustainability Management Programme in the interest of effective impact management, the adoption and updating of the SPP Sustainability Strategy 2050 and targets for achieving sustainability, as well as supervising the implementation of the targets set out in the SPP Sustainability Strategy 2050 and the assessment of sustainability risks.

**More information on our corporate governance setup, including SPP's sustainability management and strategies, can be found in the sustainability reporting section.**

# 4

# FINANCIAL INFORMATION AND RISK MANAGEMENT

## Economic and financial performance

In 2025, SPP's **revenues from customer contracts** totalled €2 463 million, representing a decline by €305 million year-on-year. The change in revenues was influenced by a drop in natural gas sales by €252 million and lower electricity sales by €53 million, as a result of a drop in commodity prices in the markets. In addition to standard price regulation, gas and electricity supply prices for vulnerable customers were influenced by extraordinary measures in the form of price caps via the so-called crisis regulation conducted pursuant to Slovak government regulations. In addition to direct revenues from gas supply contracts, revenues in 2025 were also positively impacted by applied compensations for capped gas supply prices. However, on a year-on-year basis, the compensations for capped gas supply prices for households fell by EUR 232 million, resulting from the lower difference between the regulated price approved by the Regulatory Office for Network Industries (RONI) for 2025, which was set lower than the regulated price for 2024, and the level of capped prices.

**Key items in operating expenses** comprised gas purchase costs, electricity purchase costs, and gas storage costs. SPP's lower gas purchase costs in 2025 over the previous year related to a drop in commodity prices in the markets and also to a lower quantity of purchased gas, in particular as a result of a drop in the trade volume on the commodity markets. With respect to the diversification of sources, gas transmission and storage costs had a significant impact as well.

In 2025, SPP recorded a slight decline in its share in the gas supply market (by 0.9 TWh), while on the domestic electricity supply market it recorded a higher share (by 0.5 TWh), being able to successfully exploit market opportunities while maintaining competitive pricing and profitability. The significant optimisation of SPP's sourcing

costs was down to constantly improving the resource management strategy in the form of optimal utilisation of storage facilities, transmission capacities and concluded bilateral contracts, and by maintaining a conservative risk policy. The said activities, along with active cash flow management, contributed to producing a positive operating income totalling €134 million.

**Profit from financial operations** before tax reached €148 million in 2025, thanks to dividends paid out by the company SPP Infrastructure, a. s. in the amount of €141.8 million and the positive impact of interest income worth €9.8 million. Profit before tax was €282 million. The total income tax liability reached €44 million, of which a special levy comprised €11 million. Profit after tax amounted to €238 million.

## Comparison of financial results (in € million)

	2025	2024
Revenues from customer contracts	2 463	2 768
Operating profit	134	156
Profit before tax	282	351
Income tax	(44)	(72)
Profit after tax	238	279

## Capital Structure

**Total assets** of SPP came at €3 765 million as at the balance sheet date. These were down €473 million against the previous period (index of 0.89), in particular as a result of lower current assets and a slight increase in non-current assets.

Non-current assets amounted to €2 212 million. Among key items in non-current assets were non-current financial investments and real-estate investments, followed by buildings and structures (including unfinished capital construction), other non-current assets, and a deferred tax asset.

**Non-current assets** comprised 58.8% of total assets. These were up slightly by €15 million against the previous year. The item 'Buildings, structures, machinery and equipment and intangible non-current assets' saw a minimal increase by €1 million, while the deferred tax asset rose by €28 million. Other non-current assets dropped by €12 million against the previous period due to a decline in non-current receivables from financial derivatives as a result of lower commodity prices in the markets. Non-current financial investments fell by €2 million.

**Capital expenditures** totalled €10 million in 2025. The company mostly invested in technical, commercial, and IT communication systems, as well as in the reconstruction of SPP's office buildings and facilities.

As of the balance sheet date, **current assets** consisted of receivables, inventories, and cash. Their total amount reached €1 553 million, accounting for 41.2% of total assets. This was a drop of €488 million against the

previous year. This significant decrease in current assets was caused by receivables falling by €276 million, including in particular the receivables from gas trades, as well as by lower gas receivables held against key customers, and a drop in short-term receivables from financial derivatives. Year-on-year, the cash balance decreased by €196 million and the value of natural gas reserves also fell slightly by €15 million.

**Shareholders' equity** amounted to €2 742 million in 2025, representing 72.8% of the company's total capital. In addition to share capital, this included the statutory reserve fund, other funds, provision from hedging derivatives, retained earnings, and income of the current period. Shareholders' equity in SPP fell by €286 million year-on-year as a result of a drop in the hedging derivatives provision, other funds and in the financial result.

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

The **balance** of SPP's **statutory reserve fund** stood at €1 198 million as of 31 December 2025, remaining on the level of 2024.

In 2025, **liabilities** totalled €1 023 million, down €187 million year-on-year. Total liabilities comprised non-current liabilities of €86 million and current liabilities of €937 million. The year-on-year change mainly included a drop in trade payables, especially gas purchase liabilities due to a lower quantity of natural gas purchased, as well as liabilities from financial derivatives due to lower commodity prices in the markets. On the other hand, short-term loans rose by €170 million, mainly due to a €140 million payout from the capital fund to the

## Assets Structure Comparison (in € million)

### Non-current assets

2025	2024
<b>2 212</b> € million	<b>2 197</b> € million
<b>58.8%</b>	<b>51.8%</b>

### Current assets

2025	2024
<b>1 553</b> € million	<b>2 041</b> € million
<b>41.2%</b>	<b>48.2%</b>

## Comparison of total capital structure (in € million)

### Equity

2025	2024
<b>2 742</b> € million	<b>3 028</b> € million
<b>72.8%</b>	<b>71.4%</b>

### Liabilities

2025	2024
<b>1 023</b> € million	<b>1 210</b> € million
<b>27.2%</b>	<b>28.6%</b>

shareholder, a dividend payout to the shareholder of €230 million and the funding of a higher amount of natural gas reserves on grounds of fulfilling the general economic interest to safeguard the security of gas supplies by ensuring gas reserves in underground storage facilities (an increase in reserves by 8.7 TWh).

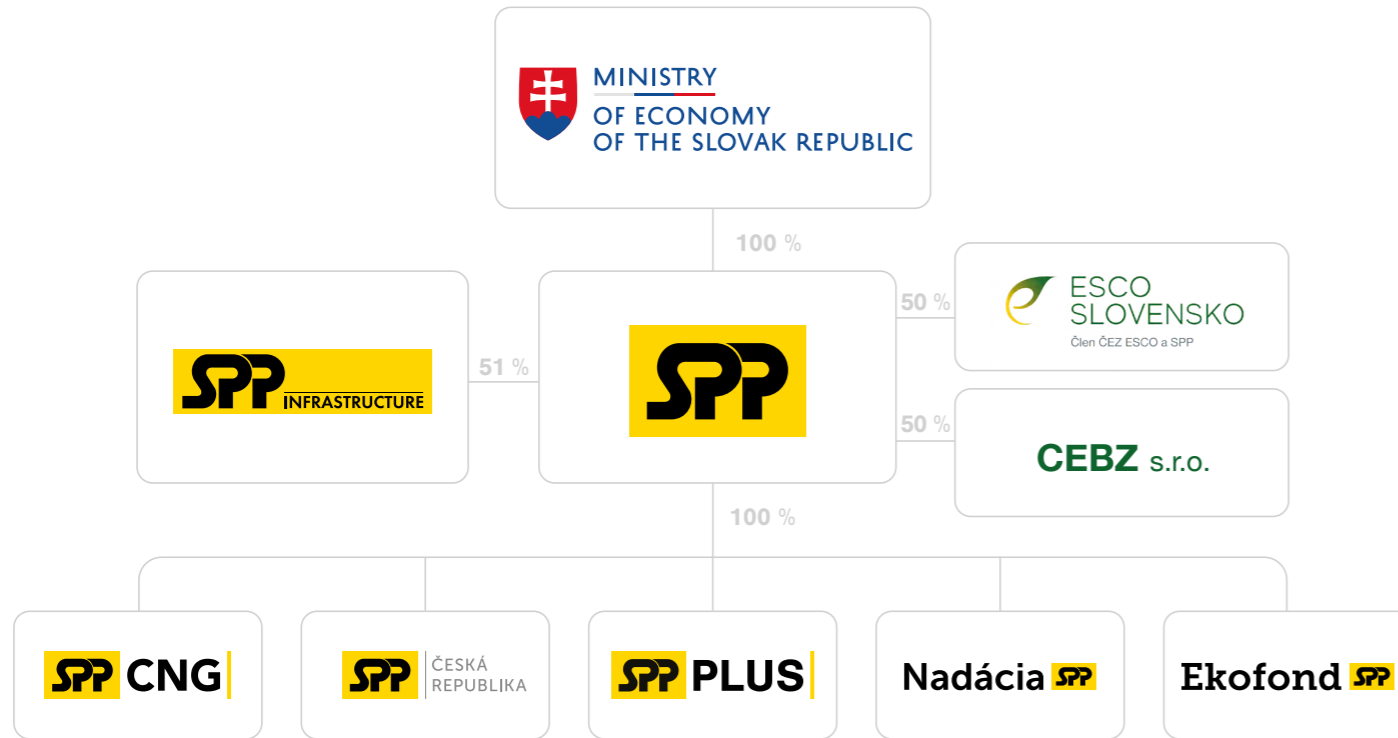
## SPP Shareholder Structure as of 31 December 2025

Ministry of Economy of the Slovak Republic

<b>2024</b>
<b>26 666 536</b> shares
<b>100%</b>



## Equity Holdings



The company operates an organisational unit in the Czech Republic.

## Risk management

Developments in the European energy market during the post-energy crisis period continued to shape fundamental changes in the approach to resource management in SPP and also had a significant impact on risk management processes. Although market conditions partially stabilised in 2025, ongoing geopolitical tensions, the growing importance of LNG in the European portfolio, and the pressure to maintain high levels of natural gas reserves in storage facilities, created the need to continue adapting established practices. Higher costs of storage, transportation and resource diversification remained an important factor in setting the strategy.

In 2025, SPP successfully adapted to the situation that emerged after the termination of gas transportation through Ukraine, which was fully functionally replaced by alternative routes, while continuing to prepare for long-term operation without any gas supplies from the Russian Federation. The key challenge was to balance the economic impacts of the shift in sourcing with the requirements for security of supply while responding to new market opportunities. These arose primarily as a result of ongoing price volatility, differing price signals on individual commodity exchanges and product markets, as well as changes in trade margins and contractual terms and conditions for end customers.

In 2025, SPP made full use of its established partnerships with leading global players and its access to key European hubs. Thanks to the strategic utilisation of storage capacities and purchasing portfolio optimisation (a mix comprising long-term contracts and spot purchases), SPP confirmed its role as the guarantor of Slovakia's energy security. An adaptive approach to hedging made it possible to minimise the negative impacts of price fluctuations on end customers while maintaining the company's financial stability.

The adjustment of hedging strategies and implementation of additional operations to hedge price and other risks enabled SPP to optimise sourcing costs in 2025 to such an extent that they compensated for higher storage and transportation costs, while contributing to a sustainable positive operating result.

In an environment of persistent gas price volatility, optimising cash flow management remained a key element. It enabled SPP to implement all necessary operations without restrictions, while maintaining an appropriate level of debt burden and minimising the negative impact on financial results.

In making these changes, SPP has relied on a conservative long-term risk management strategy that focuses on minimising market, credit, liquidity, operational and other risks. With that, the company was able to manage the required adjustments without any negative impact on its finances or stability.

The risk management strategy centring on ensuring financial and operational stability remains one of the pillars for achieving SPP's business and development goals in 2026.

In conducting its business activities, SPP employs a stable and functional risk management system. This includes a clearly defined organisational structure and effective processes for identifying, analysing, evaluating, handling, monitoring and reporting risks. These processes make it possible to eliminate potential financial losses or other negative consequences of arising risks so they do not endanger the company's capacity to provide services to customers.

The risk management system covers all relevant risks to which the company may be exposed, with its implementation falling to the independent Risk Management Department.

In managing its risks, SPP mostly focused on the following in 2025:

- a) market risks that manifested in 2025 in the form of risks associated with volumes and prices in commodity purchases/sales and storage facility position management, 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, and spreads affecting the utilisation of storage facilities, coupled with strong volatility. In 2025, SPP continued in its strategy to minimise open positions by applying 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 internal processes;
- e) other risks, in particular strategic, regulatory, and legal risks.

In 2025, SPP continued to implement the Sustainability Management Programme, under which it prepared and regularly updated a register of sustainability risks, including risks related to the fulfilment of the SPP Sustainability Strategy 2050.

This conservative risk management strategy continues to be developed and improved as it remains a basic prerequisite for the successful functioning of an adaptable resource management strategy that allows SPP to sustainably achieve its financial and strategic goals under the challenging conditions of 2026.

### **Post balance sheet events**

No events occurred after 31 December 2025 that would have a significant impact on the individual and consolidated financial statements of the company.

Starting 1 January 2026, the agreed short-term natural gas deliveries from Gazprom Export LLC were supplied partially via an alternative transport route. On 2 February 2026, *Regulation (EU) 2026/261 of the European Parliament and of the Council on phasing out Russian natural gas imports and preparing the phase-out of Russian oil imports, improving monitoring of potential energy dependencies and amending Regulation (EU) 2017/1938* entered into force. The company harmonised the contractual terms and conditions with Gazprom Export LLC so that natural gas deliveries can continue in accordance with the new legislation, which was confirmed by the decision of the MoE SR, as the approving authority, to grant a temporary exemption and issue a prior permit to import natural gas.

In connection with the ongoing military conflict in the Middle East, the company provided information in Note 4 to the individual and consolidated notes.

# 5 ELECTRICITY AND GAS SUPPLY IN 2025

## **SPP – the leader in energy supplies**

In 2025, 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 continued to diversify and optimise the sourcing of natural gas supplies in 2025, being able to guarantee the security and continuity of gas supplies to all company customers, from households to large industrial consumers.

In the past year, SPP supplied 30 TWh of gas to end gas customers and other gas suppliers in Slovakia (of which 29 TWh comprised gas supplies to end customers). SPP's total market share in gas supplies amounted to around 60%.

SPP supplied 3 TWh of electricity to end electricity customers or other electricity suppliers in Slovakia (of which 2.4 TWh comprised electricity supply to end customers). SPP's market share in electricity supplies amounted 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 was supplying electricity to as many as 330 000 points of supply.

The subsidiary operating in the Czech Republic – SPP CZ, supplied approximately 6.6 TWh of gas and 1 TWh of electricity to its customers in 2025. With these results, 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, and also in households. In the retail segment, SPP CZ supplies gas or electricity to about 15 000 points of supply.

## **Developments in the gas and electricity market**

In the past two years, total gas and electricity consumption in Slovakia has been rising year-on-year. The consumption by households also increased in 2025, along with growing consumption by corporate customers. This time, these developments were due to lower-than-average temperatures, which outweighed the ongoing efforts among customers to achieve energy cost savings.

The European gas market was well supplied and despite growing demand in the power and other sectors and the impact of significant geopolitical risks, it was balanced on the supply side by the diversification of sources, mainly through higher 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 2024/2025 heating season reached an above-standard level of about 95% for the second year in a row. We once again succeeded (well in advance) to

achieve the established target to have storage facilities filled to 90% as of 1 November 2024. Improvements in energy efficiency and a reduction of gas consumption remain key measures pursued by the European Union (EU).

In 2025, energy commodity prices fell while emission allowance prices kept rising, ultimately leading to a slight year-on-year decrease in electricity prices. They remained below 100 €/MWh for most of the year.

The significant gas price hikes caused by the final termination of gas transmission through Ukraine at the end of 2024, manifested in the first weeks of 2025 and, combined with the impact of damage to Ukrainian energy infrastructure, caused gas prices to peak in February 2025. Gas prices then declined during the rest of the year. In 2025, there was also a growth in global trade and LNG export capacities.

## **Diversification and security of gas supplies**

An ongoing priority of SPP is to guarantee secure gas supplies to all customers, from large industrial businesses to households. The termination of gas transportation through Ukraine at the start of 2025 confirmed the correct setting of SPP's strategy and capitalised on activities in recent years aimed at combining diversification contracts and secured transportation routes with sufficient gas balances in storage facilities.

In respect of diversification contracts, SPP continued cooperating with counterparties from previous years. Continuous negotiations produced contracts with additional partners. New gas sources were complemented by the acquisition of corresponding transport routes that, if necessary, will facilitate gas transportation from these

sources to our territory. The third, especially from the viewpoint of the seasonal nature of consumption in Slovakia, and integral part of gas sourcing is storing gas in gas storage facilities. The company maintains a strong preparedness in this area, as shown by the above-standard volume of 17.8 TWh of contracted storage capacities at the start of the 2025 heating season (as of 1 November 2025).

The termination of gas transportation through Ukraine also tested SPP's readiness in terms of the diversification of sources and transportation routes. However, thanks to ongoing negotiations, we were able to secure partial gas supplies under a long-term contract with Gazprom Export by using alternative transportation routes. It is still true that gas supplied under a long-term contract was a cheaper option compared to other alternatives. The outage of this gas source is being felt in market gas prices as the respective volume is missing on the supply side. Alternative gas sources from geographically more distant suppliers come with higher transportation costs.

### **Strengthening customer experience and modernising services**

For SPP, the period of 2025 was significant in terms of modernising its services and strengthening customer relationships. Marketing activities focused on supporting a favourable energy mix, developing digitalisation and improving customer experience. The redesign of the Moje SPP (My SPP) portal continued as well, instigated by user testing and aimed at making user control easier. A uniform content and visual standard was introduced across communication channels, complemented by new templates and personalisation elements that, together with feedback, improve the customer experience.

From a marketing communication perspective, the most notable activities of the year included the **Two Energies Under One Roof** TV campaign, the Photovoltaics from SPP product campaign, and the Christmas campaign called Energy That Connects. SPP also implemented online activities and targeted communication to support business and company-wide goals, including the Photovoltaics for Schools project, which is funded by contributions from customers using the Clean Electricity from SPP service. The successful Summer Competition for a Year with Free Electricity supported the sales of SPP's products and services. In the fall, SPP was a partner of the popular TV show **Pečie celé Slovensko** (Baking All Over Slovakia), which strengthened the positive perception of the SPP brand.

Support for registrations to the customer zone and the **My SPP** mobile app continued throughout the year, providing clients with a simpler and more transparent way of managing their energy consumption. At the end of 2025,

there were over 343 000 registered users on the My SPP portal. The modernisation also included the preparation of the Hungarian language version of the website, thus expanding the availability of services to more user groups.

In the field of customer care and availability, SPP continued to modernise **SPP Customer Centres** throughout Slovakia. The SPP Customer Centre in Banská Bystrica was moved to a shopping mall, greatly improving accessibility and customer comfort.

### **Prices and regulation**

The supply of gas and electricity to customers in the household segment and to other vulnerable customers that satisfy the legislative conditions for the application of regulated prices continued to be subject to price regulation by the Regulatory Office for Network Industries (RONI) in 2025.

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 select vulnerable customers below regulated prices. These extraordinary measures greatly mitigated the negative impact on households and select vulnerable gas and electricity customers.

In 2025, SPP acted as the gas supplier of last resort in accordance with regulator RONI's decision. Supplies of gas in this mode are subject to price regulation by RONI.

# 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. With this in mind, 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 2025, SPP launched the sale of the product Photovoltaics from SPP for both households and small businesses and organisations, including the Virtual Battery option. Likewise, the company continued to provide the Clean Electricity from SPP and SPP Carbon Footprint services. Together with its customers, SPP has planted more than 2.4 million new trees since 2020 under its SPP Carbon Footprint service. Customers regularly contributed to the construction of photovoltaic power plants (PVPP) at schools as part of the Clean Electricity S from SPP service, through which SPP supplied guarantees of RES electricity produced in Slovakia. So far, thanks to its customers, SPP has launched local PVPPs at 21 schools with a total investment exceeding €580 000. SPP will continue its successful PVPP program for schools in the future. 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 such as guaranteed energy services or local PVPP sources to large customers with a total annual energy consumption of over 1 000 MWh through its subsidiary ESCO Slovensko. The implemented projects produced annual CO2 emission savings of almost 5 thousand tonnes in 2025. In 2025, ESCO Slovensko implemented PVPPs for its customers with a combined total output of more than 14 MWp.

Our own PVPP plants at SPP sites produced 924 MWh of electricity in 2025 and an additional 500 MWh was generated by PVPP plants built by us on school roofs.

In 2025, the first SPP battery energy storage facility was built in Spišská Belá with a capacity of 4 MW. It is expected to become operational in 2026.

## **Wind power**

Despite the obstacles caused by weak acceptance of wind energy by the public and complicated permit processes, SPP confirmed its ambition 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 accordance with the Integrated National Energy and Climate Plan of the Slovak Republic for 2021-2030. In 2025, SPP continued to develop wind park projects with a planned output of more than 460 MW and consistently monitored the activities of state authorities in connection with the so-called acceleration zones to speed up the development of wind energy.

Our own wind power generation projects are either at the stage following the review of the final environmental impact report, at the environmental studies stage, or pending submission of an application for environmental impact assessment. Their implementation will require close cooperation with local communities and the gaining of public trust.

## **Biomethane**

As part of the Energy and Biological Waste Recovery Centre (EBWRC) projects in cooperation with its partner – BRANTNER Slovakia s.r.o., SPP launched into operation an optical sorting line in 2025, as the first stage of the EBRWC Nové Zámky. Almost 15 400 tonnes of plastic waste were processed throughout the year. Sorting will be extended to municipal waste once applicable legislation comes into force, expected from 1 January 2027.

The procurement of biological stage technology for Nové Zámky began during the course of 2025. At this stage, biowaste will be used to produce biomethane.

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

# 7

## PEOPLE IN SPP

Employees represent one of the most important pillars of success for SPP. In 2025, the company continued to create a work environment and corporate culture that promotes performance, professionalism, expertise, and long-term sustainability, while also reflecting the changing needs of employees in a dynamic work and social environment. Through comprehensive activities in the field of human resources, SPP strengthened employee engagement, the stability of its teams, talent development, and a corporate culture based on respect, cooperation, and responsibility.

### **Collective bargaining and working conditions**

In 2025, collective bargaining took place concerning an amendment to the Collective Agreement for 2025 and 2026. In the coming years, SPP shall thus continue to provide premium conditions in respect 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.

### **Mental health**

The mental health of employees continued to be a key topic in 2025. In this field, SPP continued to implement the First Aid for Mental Health programme, under which more employees acquired the skills necessary for early recognition of the symptoms of mental disorders and appropriate handling of challenging situations.

In addition to first aid courses, the company also organised regular meetings with experts and discussions focused on various aspects of mental health. Special attention was paid to the development of managers who completed specialised training focused on preventing and addressing toxic work environments.

By implementing these activities, SPP has long strived not only to support the mental health of employees, but also to raise awareness and reduce the stigma associated with this topic at the workplace.

### **Promoting health and active lifestyle**

In 2025, SPP continued to systematically support the physical health and active lifestyle of its employees. The regular Health Days event included educational activities and interactive formats focused on healthy eating, supporting an active lifestyle and preventing civilisation diseases. The opportunity to use sporting apps, such as the Multisport or UpBalanse cards, contributed to promoting a healthy lifestyle.

### **Diversity, inclusion and equal opportunities**

Diversity and inclusion are an integral part of SPP's corporate culture. The company recognises the importance of creating a work environment that respects different life situations, needs, and experiences of employees at different stages of their lives.

SPP specifically focuses on supporting employees of all age categories. It implements activities for a group of parents that support the reconciliation of work and private life, including flexible forms of work and development and consulting activities. It creates space for employees to further their professional development, share experiences, and collaborate across generations, thereby supporting the transfer of know-how and the long-term sustainability of the company's professional capacities.

SPP is also dedicated to supporting women and strengthening their safety, self-confidence, and standing within the work environment. In 2025, the company prepared a workshop for women focused on verbal and physical self-defence, and hosted professional lectures on the status of women in the past and present.

SPP also participated in the campaign International Day for the Elimination of Violence against Women. By these initiatives, SPP systematically supports diversity in the workplace, strengthens its inclusive environment, and creates conditions for equal opportunities for all employees, regardless of their age or family situation.

### **Cooperation with universities**

SPP has been developing cooperation with universities through its graduate program and specific project activities. One example is the involvement of architecture students in the design of SPP's conference rooms, which brought new, innovative perspectives on the company's working environment. Another example is the collaboration with a group of students at various faculties of the Slovak

University of Technology (STU) on the design of technical solutions for several company projects, as well as the creative design of company events. These activities allow SPP to support the development of young talents while, at the same time, contributing to innovative solutions and strengthening relationships with universities.

### **Know-how sharing**

The second annual Impulses internal conference became an important platform for promoting internal knowledge sharing. The event connected experts from both internal and external environments and created a space to exchange experiences, inspirations and new perspectives across various fields. The conference was met with a very positive response from employees, which confirmed its contribution to the development of corporate culture and know-how sharing in the company.

**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 2025, the SPP Foundation and Ekofond SPP supported community-benefit projects worth a total of €3 436 969.59, of which the SPP Foundation provided support in 2025 through grant schemes or partnership programmes worth €3 234 591.45 and Ekofond SPP implemented activities and projects in accordance with its purpose amounting to €202 378.14. Support for community-benefit projects by the SPP Foundation through the allocation of 2% of income tax amounted to €1 015 053.86.

## **Protection of Slovak cultural heritage and promotion of art and culture**

In its field of promoting culture, the SPP Foundation has long directed financial resources to the protection, development and accessibility of cultural heritage, while encompassing a wide range of projects. It mainly supports initiatives contributing to the preservation of cultural values, and in turn to preserving the historical memory and cultural identity of Slovakia.

A major area of support comprises projects that revive traditional cultural expressions, crafts, folklore, and local customs. The foundation supports activities and events based on regional traditions that strengthen community life, deepen awareness of regional identity, and contribute to preserving customs in a modern form. This includes publications and documentation projects that focus on mapping local traditions or the historical specificities of individual regions. This support also includes the popularisation of cultural values through cultural events and activities that make cultural heritage accessible to the general public and contribute to the development of cultural life in the regions.

The SPP Gallery has played an integral part in promoting art and culture since 2000. Since its founding, it has hosted almost 200 exhibitions in various areas of the fine arts. Paintings, photographs, and sculptures have all found their place in the gallery. At the end of 2025, the SPP Gallery celebrated a quarter-century anniversary on the Bratislava cultural scene by hosting the anniversary collective exhibition entitled 25 Years of the SPP Gallery. It presented visitors with a selection of works by fifteen leading Slovak artists who had already exhibited at the SPP Gallery in previous years. Paintings were displayed by:

Daniel Brogyányi, Stano Bubán, Marián Komáček, Andrea Kopecká, Kristína Mésároš, Ivan Pavle, Peter Pollág, and Katarína Vavrová. Sculptures were presented by: František Bohunický, Jana Brisudová, Vojtech Farkaš, Milan Flajžík, Milan Lukáč, and Ján Ťapák. The SPP Gallery organised 5 exhibitions in 2025.

In 2025, SPP was also the main partner of the 31<sup>st</sup> jubilee annual ART FILM International Film Festival in Košice. Thanks to the support of the SPP Foundation, it was possible to organise yet another annual International Animation Festival – Fest Anča, which screened animated feature films in Kino Sterio (formerly Ster Century Cinemas) and short films in the premises of Stanica (Station) and Nová Synagóga (New Synagogue) with professional technical support. One of the other supported initiatives was Živé Račko (Rača Tollgate Live). The sixth annual Živé Račko festival took place in the park at Račianske mýto (Rača Tollgate) and put on a comprehensive programme including children’s theatre, physical activities, creative workshops, discussions, book exchanges, a rich NGO zone, and musical performances. The event also offered a diverse street-food zone, supporting local groups and community initiatives, while actively connecting residents in a space that, thanks to the festival, is becoming a vibrant community centre. Among those who used the SPP Foundation’s support was the GUnaGU Theatre, presenting a large retrospective programme Cabaret Best of GUnaGU 1985-2025 during its 40<sup>th</sup> jubilee season. Thanks to the provided funds, it was able to prepare original props, video art, professional projection, as well as two gala premieres for guests, partners and former members of the theatre company. The theatre also organised the GUnaGU Summer Festival and gave performances at the festivals Kremnické Gagy (Kremnica Gags) and Piešťanské zábaly (Piešťany Mud Wraps),

thereby enriching cultural events in the capital even outside the traditional season.

The Slovak Gas Museum has been mapping the past and present of the gas industry in our country for 29 years. With more than 600 exhibits, this museum is one of a kind in Slovakia. In 2025, 1 800 visitors paid a visit to the historic section of the museum.

### **Supporting sports**

SPP has been a member of the Paralympic family for more than 20 years with the objective of supporting the combination of sport, diversity and inclusion. In 2025, we were a proud partner of the Slovak Paralympic Team that represented our country in various Slovak and international competitions. It was also thanks to this preparation that the athletes managed to qualify for the Milano Cortina 2026 Winter Paralympic Games.

In 2025, SPP continued in its partnership with the Žampa brothers who represent our country in alpine skiing and Tadeáš Teťák, a young talented golfer. SPP has enthusiastically followed the successes of many Slovak athletes represented, for instance, by the Slovak Skiing Association, the Slovak Karate Association, Slávia Banská Bystrica, and other clubs. We also became a partner of Martin Beňuš, a successful whitewater slalom racer and world-class athlete – an Olympic medallist from Rio de Janeiro 2016 and Olympic medallist from Paris 2024.

Thanks to the SPP Foundation, the international biathlon competition IBU Cup Brezno–Osrbliie was organised in 2025 at a high level, effectively promoting the region and Slovakia and creating quality conditions for both athletes and spectators. Likewise, the Slovak Tennis Association's project – Children's Davis Cup – greatly supported children's sports training, motivated clubs to engage in regular activities, and enabled meetings with successful players. The Žampa Cup, organised by the Žampa brothers, engaged more than 800 children and youth in sports activities, while a series of events, workshops and educational activities supported their self-confidence, motivation, and relationship to exercise and a healthy lifestyle.

### **Provision of public beneficial services in the field of environmental protection and education**

The SPP Ekofond has long been dedicated to initiatives focused on efficient energy use, environmental protection, and education. It fulfils its mission through public benefit projects that have a positive impact and contribute to the sustainable development of society as a whole.

Through the nationwide school competition Greenfluencers and Energy for 2<sup>nd</sup> graders at elementary and secondary schools, the e-learning programme Green Mission for kindergartens and pupils in 1<sup>st</sup>-4<sup>th</sup> grades at elementary schools, SPP Ekofond has systematically supported educational activities in the field of sustainability. These initiatives contribute to the development of energy literacy and environmental awareness, while also strengthening the ability of young people to cooperate, communicate and manage projects, and also take a responsible approach to current social issues.

This generates interest among children and the 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 at the Slovak Gas Museum. In 2025, the SMART ENERGY exhibition was visited by more than 1 000 people, mainly from primary and secondary schools.

At the beginning of 2025, SPP Ekofond raised awareness about the study course entitled Energy Equipment of Buildings Technician (EEBT) by way of an online and radio campaign. It was created under the auspices of SPP Ekofond and is currently taught at seven secondary schools across Slovakia. The study course has long reflected the demand on the labour market for quality and qualified experts in the field of the technical and energy equipment of buildings.

In 2025, the protection of native Tatra forests from logging continued in the localities of Kežmarské Žľaby, Kráľovská Ľubňa, Poš and Spišská Belá. The preservation of 705 century-old fir trees in various parts of TANAP, secured in previous years, has created a stable foundation for the

long-term protection of these rare forests and their natural gene pool, spanning an area of more than 70 000 m<sup>2</sup>. SPP Ekofond also continued its cooperation with Občianske združenie Les (the Forest Civic Association) by raising awareness about the protection of forests and the importance of wetlands in the form of information boards installed in protected locations.

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 involves caring for bee colonies located at SPP sites in Bratislava and Košice, which are maintained by SPP employees. The project continues to raise awareness and provide information through communication on social media.

In the interest of protecting pollinators and biodiversity, in 2025 SPP Ekofond continued in activities mitigating the arrival of the invasive Asian hornet species (*Vespa velutina nigrithorax*) to the territory of Slovakia. A series of 5 online training sessions took place, where experts provided participants not only with basic information about the Asian hornet, but also various interesting facts and advice on how to protect themselves from this species as effectively as possible. The training sessions were aimed at population groups that may be most affected by the arrival of the Asian hornet – gardeners, winegrowers, fruit growers, beekeepers, volunteer firefighters, as well as local governments. A total of 146 participants attended the training sessions.

SPP Ekofond also focused on further developing the Stop the Hornet mobile app, which was used to make 323 reports of potential occurrences during 2025. There were over 4 700 app downloads made during the year. The two released app updates focused mainly on improving the user interface.

SPP Ekofond contributed to the protection of pollinators and biodiversity in cooperation with the Slovak Academy of Sciences (SAS) by providing laboratory equipment to conduct an expert analysis on the Asian hornet topic. Thanks to this study, it will be possible to determine the reproduction method by using the genetics of individuals from Slovakia and abroad and set an appropriate strategy to stop the spread of the Asian hornet.

As part of the We Do Not Sleep, We Plant With SPP project, SPP Ekofond continued in 2025 to cooperate with the Slovak University of Agriculture in Nitra. At the SPP site in Bratislava, we revitalised the area around the apiary, showing that even in an industrial environment it is possible to create green oases that support life, protect nature and, at the same time, bring people peace, relaxation and inspiration.

SPP Ekofond also restored green areas around the apiary at the SPP site in Košice. Natural greenery and native plant species were used in the restoration, creating a favourable environment for bees and other pollinators. The revitalised area thus contributes to supporting biodiversity and improving the quality of the environment at the site.

As part of the activity Development of energy literacy in the area of natural gas usability and in cooperation with the Slovak University of Technology (STU), SPP Ekofond has prepared two expert studies: “Analysis and comparison of natural gas combustion to other commodities, such as coal or biomass in the form of wood chips and pellets” and “Analysis of compressed natural gas – CNG as a fuel in comparison to other fuels (diesel, gasoline and others)”. The goal of these studies is to educate the public about the advantages and disadvantages of using natural gas and other renewable and non-renewable energy sources.

In the field of environmental protection, the SPP Foundation supports projects that improve the quality of the environment, contribute to the sustainable development of communities, enhance public spaces and natural sites, or implement environmental activities such as planting greenery or cleaning and revitalising areas.

In the field of education, the SPP Foundation supports ambitious projects that develop the formal and informal education of children and youth, improve the teaching process, support schools, educational institutions and schemes aimed at developing practical skills or modern educational methods. The SPP Let’s Do It For Our Children grant scheme primarily focuses on projects addressing the mental health topic by developing social skills, strengthening mutual relationships, and improving the overall well-being of students and young people.

### **Philanthropy, support for disadvantaged groups and society development through the SPP Foundation**

In the course of 2025, the SPP Foundation announced several 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, the “Employee Grant Programme” for SPP employees so that they are able to provide assistance where they deem it necessary. The SPP Foundation supports disabled people through the Support to Individuals scheme, by which it seeks to help arrange rehabilitation sessions, therapies, and secure various medical devices.

An overview of the support provided by the SPP Foundation and its expenditures on public benefit purposes is presented in the tables below.

**Table – Overview of support provided in the form of SPP Foundation’s grant schemes**

Grant scheme name	2025	2025	2024	2024
	Number of supported applications	Support amount in euros	Number of supported applications	Support amount in euros
Employee Grant Scheme	57	49 500.00	61	47 118.66
One Step Ahead grant scheme	40	30 000.00	42.00	60 000.00
Municipality scheme – Eustream’s sub-scheme	21	135 413.19	42.00	203 504.10
Crutch grant scheme	0	-	85.00	58 320.00
You Too Engage In Sports! grant scheme	120	199 044.68	135.00	198 018.89
Let’s do it with SPP grant scheme	61	149 550.00	65.00	150 000.00
Support to Individuals grant scheme	258	350 058.68	279.00	443 744.75
Together With SPP For Communities grant scheme	80	191 545.99	107.00	196 609.50
Special grant scheme for municipalities in the SK-UA border region	0	-	18.00	30 630.00
Special grant scheme for Banská Štiavnica	0	-	0.00	0.00
Special grant scheme for SPP employees	0	-	5.00	7 960.00
Fénix – Cultural Monument of the Year	0	-	3.00	30 000.00
Regions	65	150 000.00	0	0.00
Eustream’s donations	12	12 727.00	18	30 630.00
SPP - distribúcia’s donations	0	-	0	0.00
Nafta’s internal grant scheme	13	55 706.00	0	0.00
<b>TOTAL:</b>	<b>727</b>	<b>1 323 545.54</b>	<b>860</b>	<b>1 456 535.90</b>

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

Support area	2025	2025	2024	2024
	Number of supported applications	Support amount in euros	Number of supported applications	Support amount in euros
Protection and promotion of health	48	284 616.00	25	153 680.00
Promotion and development of sports	51	591 220.00	28	233 215.00
Provision of social assistance	28	160 800.00	21	156 520.00
Preservation of cultural values	75	517 480.00	74	396 540.00
Promotion of education	57	266 236.45	36	158 830.38
Protection and creation of the environment	17	65 338.00	7	44 160.00
Science and research	2	14 000.00	3	34 000.00
Protection of human rights	3	11 500.00	2	4 000.00
<b>TOTAL:</b>	<b>281</b>	<b>1 911 190.45</b>	<b>196</b>	<b>1 180 945.38</b>

**Table – Overview of expenditures for the public-benefit purpose of Ekofond SPP**

Support area	2025	2024
	Expenditures in euros	Expenditures in euros
Education	68 268.82	125 017.40
Environmental protection	109 671.91	152 442.41
Other public-benefit activities	24 437.41	279 391.57
<b>TOTAL:</b>	<b>202 378.14</b>	<b>556 851.38</b>

# 9 ENVIRONMENTAL IMPACT INFORMATION

In the following chapter, SPP discloses information on the topics of Pollution, Water and Marine Resources, and Biodiversity and Ecosystems, which were reported in the Consolidated Sustainability Statement in 2024. Following an internal review of the topics and their validation with external stakeholders, the above topics were omitted in the compilation of the 2025 SPP Annual Report as the impacts, risks and opportunities related to them were assessed as not material. However, in the interest of maintaining a higher level of transparency, SPP publishes certain information related to the omitted topics in this chapter.

## **Pollution**

SPP has policies in place in the field of environmental pollution prevention. The basic internal documents that regulate also pollution are the SPP Sustainability Strategy 2050 and the Sustainability Management Programme. In addition, 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<sup>1</sup>) 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. 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 body of SPP responsible for overseeing the impacts of SPP’s activities and their

mitigation. The approval of internal regulations in the field of pollution prevention 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.

## **Pollution of air, water and soil**

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. We monitor all sources of pollution and regularly report on emissions in accordance with legislative requirements.<sup>2</sup>

In total, SPP operates 23 small and 11 medium air pollution sources throughout Slovakia. For the purposes of SPP Customer Centres, we use additional 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.

<sup>1</sup> In addition to the above, IMS also includes ISO 45001:2018 and ISO/IEC 27001:2022.

<sup>2</sup> § 33a (1) of Act No. 17/1992 Coll. on the Environment; § 15 (1) (ah) of Act No. 137/2010 Coll. on Air Protection and Decree No. 411/2012 Coll. on monitoring emissions from stationary sources of air pollution and air quality in their surroundings, as amended.

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.<sup>3</sup> The calculation is made according to 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 Coll. 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.<sup>4</sup>

If any determined limits are exceeded during regular measurements, we identify the cause and apply 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 SPP Business Plan. In 2025, SPP reconstructed the boiler rooms in Michalovce and Prešov.

**Table – 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)

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 NO<sub>x</sub> from combustion equipment, to 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 operations 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.

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, are sent by the authorised person to the information system of the Slovak Hydrometeorological Institute. In 2025, we had the first periodic discontinuous emission measurement performed at the reconstructed source in Michalovce. The next emission measurement is planned for 2026 at the cogeneration unit and gas boilers in Bratislava.

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

	Solid pollutants (SP)	Sulphur oxides (SO <sub>x</sub> )	Nitrogen oxides (NO <sub>x</sub> )	Carbon monoxide (CO)	Total carbon (TOC)
<b>2025</b>	0.2641	0.0324	5.097	2.0556	0.3425
<b>2024</b>	0.1998	0.0252	3.834	1.5451	0.2575

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 for 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 off sites and buildings that are operated using these sources.

<sup>3</sup> In Decree No. 410/2012 Coll., implementing certain provisions of the Air Protection 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.

<sup>4</sup> <https://www.spp.sk/sk/vsetky-segmenty/o-spp/udrzatelnost-a-ochrana-zivotneho-prostredia/plnenie-standardov/>

In 2025, there was an increase in pollutants released into the air from medium air pollution sources compared to the year before, due to greater internal consumption of natural gas. In 2025, gas consumption increased from a record low in 2024 mainly due to weather conditions (higher consumption for heating in winter and cooling in summer).

Given the office nature of our activities, SPP considers microplastic pollution related to our own activities to be insignificant.

### **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 the SDS for the substance – natural gas, which was conducted on 28 July 2025. All safety data sheets are kept in the Besoft application – chemical substances module, at the Occupational Safety and Environment 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 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.

### **Water and marine resources**

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<sup>5</sup>) 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. 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 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 stakeholders are informed in multiple ways, mainly through the company website. All employees are acquainted with the policies governing water management and updates thereto through internal regulations and regular training.

SPP informs employees about latest measures via standard internal information means (intranet, internal magazine). At the same time, the company gives employees 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.

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, in the annually compiled SPP Business Plan the company regularly allocates adequate funds for measures to reduce impacts and for economical water use. 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 by 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 in a 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. In 2025, the permit was renewed for pumping groundwater from a well at the SPP site in Košice at Moldavská cesta 12.

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 in water quality, we have prepared the Preventive Measures Plan to prevent the occurrence of any uncontrolled release of pollutants and

<sup>5</sup> In addition to the above, IMS also includes ISO 45001:2018 and ISO/IEC 27001:2022.

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 were issued with 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 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.<sup>6</sup> If any irregularities are detected, we take corrective measures, such as regular cleaning of the sewer network, sewer inlets and respective water structures like oil separators or grease traps, landscaping to prevent water level surges, the repair 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 some service or wastewater analysis, is recorded in the operating logbook.

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. SPP has set limit values for groundwater extraction from its well, up to a maximum of 47 304 m<sup>3</sup>/year, pursuant to the applicable decision issued by the district office.

### Water consumption

Total water consumption in 2025 was as follows:

**Table – Overview of water consumption (in m<sup>3</sup>)**

	Water withdrawal by source			Discharged water by destination	
	Groundwater	Water from regional water companies	Total water consumption	Surface water	Total water discharged
<b>2025</b>	16 195	32 314	<b>48 509</b>	31 063	<b>31 063</b>
<b>2024</b>	20 866	32 348	<b>53 214</b>	31 028	<b>31 028</b>

In 2025, a lower amount of groundwater was pumped from the well in Bratislava compared to 2024, mainly due to lower consumption by cooling towers and site irrigation systems.

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.

**Table – Water consumption intensity of SPP based on turnover and operating profit**

	Total water consumption (in m <sup>3</sup> )	Turnover (consolidated) (in € million)	Operating profit (consolidated) (in € million)	Water consumption intensity based on revenues (in m <sup>3</sup> /€ million)	Water consumption intensity based on operating profit (in m <sup>3</sup> /€ million)
<b>2025</b>	48 509	3 030	146	16.010	0.332
<b>2024</b>	53 214	3 480	164	15.291	0.324

<sup>6</sup> Regulation of the Government of the Slovak Republic No. 269/2010 Coll., which establishes the requirements to achieve a good status of waters.

**Biodiversity and ecosystems**

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 line 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 from 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 that 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 mitigation. The approval of internal regulations in the protection 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 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 the opportunity to report any need to take additional measures in biodiversity and ecosystems protection or violations of internal policies or obligations, this 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 focused on 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.

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 that are implemented by Ekofond SPP are communicated directly by Ekofond SPP or SPP via the website or by press releases or other forms of marketing communication.

In addition to providing advice on more sustainable solutions (not only in the power sector) and motivating customers to cut their energy consumption, the SPP Carbon Footprint service 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 2.4 million saplings in protected forests of Slovakia between 2020 and 2025. This planting took place in the territories of the Tatra National Park

Administration (TANAP), the Low Tatras National Park (NAPANT), the Veľká Fatra and Malá Fatra National Parks, the Pieniny National Park, as well as in the Choč Mountains Protected Bird Reserve.

In 2025, SPP supported forest restoration by planting more than 490 000 trees, such as in the locations of Vyšná Boca, Partizánska Ľupča, Liptovská Lúžna, Iľanovo Valley, Demänová, Hrabovo, Čutkovo Valley, Kráľová Lehota, Starý Smokovec, Kvačany, Jalovec Valley, Turické Poľany, Kráľovská Ľubeľa. 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.

In the planting of trees, SPP cooperates with biodiversity protection experts from the Tatra National Park Administration (TANAP) and the Low Tatras National Park (NAPANT).

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 the field of nature and landscape protection, we fulfil our legal obligations regarding tree felling, replacement planting, and exceptions to species protection.



# 10

# FINANCIAL STATEMENTS

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

	Year ended 31 December 2025	Year ended 31 December 2024
Revenues from customer contracts	2 463	2 768
NG and E compensations	205	437
Other gains and losses	7	(75)
Purchase of natural gas, purchase of electricity and consumption of material and energy, change in inventories, capitalisation	(2 343)	(2 800)
Storage of natural gas and other services	(137)	(115)
Depreciation and amortisation	(10)	(10)
Personnel costs	(46)	(41)
Adjustments to bad or doubtful receivables, net	(3)	(8)
Provisions and impairment losses, net	(2)	0
<b>Operating profit</b>	<b>134</b>	<b>156</b>
Profit/(loss) from investments	149	198
Cost of financing	(1)	(3)
<b>Profit/(loss) before tax</b>	<b>282</b>	<b>321</b>
Income tax	(44)	(72)
<b>PROFIT FOR THE PERIOD</b>	<b>238</b>	<b>279</b>

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

	Year ended 31 December 2025	Year ended 31 December 2024
Revenues from customer contracts	2 825	3 043
NG and E compensations	205	437
Other gains and losses	10	(81)
Purchase of natural gas, purchase of electricity and consumption of material and energy, change in inventories, capitalisation	(2 689)	(3 053)
Storage of natural gas and other services	(143)	(121)
Depreciation and amortisation	(10)	(10)
Personnel costs	(49)	(43)
Adjustments to bad or doubtful receivables, net	(4)	(8)
Provisions and impairment losses, net	1	-
<b>Operating profit</b>	<b>146</b>	<b>164</b>
Profit/(loss) from investments	10	24
Share in profits of affiliated companies and joint ventures	196	247
Cost of financing	(1)	(3)
<b>Profit/(loss) before tax</b>	<b>351</b>	<b>432</b>
Income tax	(45)	(74)
<b>PROFIT FOR THE PERIOD</b>	<b>306</b>	<b>358</b>
Net profit belonging to:		
SPP shareholders	306	358
Minority holdings of other owners of subsidiaries	-	-
<b>Total</b>	<b>306</b>	<b>358</b>

# 11

## 2025 SPP PROFIT DISTRIBUTION PROPOSAL

The 2025 Profit Distribution Proposal has been prepared in accordance with the Articles of Association of Slovenský plynárenský priemysel, a.s., Article XIX – PROFIT DISTRIBUTION, Article XVIII – CREATION AND USE OF THE RESERVE FUND, Article XX – CREATION OF OTHER FUNDS, and in accordance with the provisions of the Commercial Code. The 2025 Profit Distribution Proposal is based on the audited 2025 Individual Financial Statements.

### **Profit distribution proposal for the accounting period of 2025**

	<b>Amount in euros</b>
Net profit for the current year 2025	238 295 983.05
Replenishment of the statutory reserve fund (pursuant to Article XVIII of the Articles of Association, the reserve fund reached the 20% limit of share capital)	0.00
Profit designated for dividends	238 295 983.05
Transfer to retained earnings	0.00
Royalties to members of company bodies	0.00

# 12

# CONSOLIDATED SUSTAINABILITY STATEMENT

## 12.1. Independent Auditor's Limited Assurance Report on the Consolidated Sustainability Statement

## Slovenský plynárenský priemysel, a.s.

### INDEPENDENT AUDITOR'S LIMITED ASSURANCE REPORT ON THE 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 2025 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 Article 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 Statement (the "Process") is in accordance with the description set out in Note IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities; and
- Compliance of the disclosures in 12.3. EU Taxonomy compliant reporting of sustainable investments subsection within the environmental section of the Consolidated Sustainability Statement 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 Statement

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.

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

Management of the Company 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 processes 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 12.3. EU Taxonomy compliant reporting of sustainable investments subsection within the environmental section 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 processes 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 our 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 processes 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.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

#### **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 Description of the processes to identify and assess material impacts, risks and opportunities; and
- Compliance of the disclosures in 12.3. EU Taxonomy compliant reporting of sustainable investments subsection within the environmental section of the Consolidated Sustainability Statement with Article 8 of the Taxonomy Regulation.

#### **Other Matter**

Under the Act on Accounting, the Company is not required to prepare a consolidated sustainability statement as at 31 December 2025. The Company has voluntarily decided to obtain limited assurance on the consolidated sustainability statement.

Bratislava, 21 April 2026

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

## 12.2. ESRS 2 General Disclosures

### **BP-1 General basis for preparation of sustainability statements**

The 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, it is a means of providing transparent information about SPP's results and measures taken in the field of sustainability.

This Sustainability Statement has been prepared on a consolidated basis, whereby the scope of consolidation is identical to that of the Financial Statements and is compiled for the period from 1 January 2025 to 31 December 2025 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 compiling this Sustainability Statement are the standards set out 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 via 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 their low significance or due to the fact that the activities of SPP CZ and SPP CNG do not cause any impacts in these areas.

This Sustainability Statement does not describe the activities and impacts of the subsidiary SPP plus, which was established by SPP in 2025, as SPP plus was inactive and did not conduct any business activities in 2025.

The option to omit specific information due to intellectual property, know-how, or innovation outputs, or the option to omit information on unfinished matters or matters 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 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, ESG and Public 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, as follows:

- (a) for a short-term horizon, the period that the enterprise has adopted as the reporting period in its financial statements;
- (b) for a medium-term horizon, from the end of the short-term reporting period defined in point (a) up to 5 years; and
- (c) for a long-term horizon, more than 5 years.

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 regarding internal electricity and heat consumption values of SPP CZ presented in section E1-5 Energy consumption and mix and 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 volume 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 2024 was used. The emission factor of the supplied electricity within the so-called residual energy mix for the 2025 period will be published at the turn of May and June 2026. This procedure, which was also used to prepare the statement for 2024, 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.

The base year used in compiling this statement is 2024. This statement includes comparisons with previous periods.

**Correction of an error from the previous period**

When preparing this statement as part of reporting its own energy consumption in Chapter E1 Climate Change, Section E1-5 Energy consumption and mix compared to the statement for 2024, SPP took into account the fact that pursuant to electricity consumption for SPP’s internal purposes, this electricity is produced in a high-efficiency combined heat and power (CHP) cogeneration source operated by SPP that uses gas as the primary fuel. Since gas consumption at the CHP plant is part of the energy consumption reported by SPP in section E1-5, the company does not report its own electricity consumption within its total energy consumption in section E1-5 in order to avoid double counting of the energy consumed. In respect of the above, SPP adjusted the originally erroneously reported data on SPP’s total energy consumption for 2024 in Part E1-5, Tables 13 and 14, by deducting the amount of electricity consumed by SPP from SPP’s total energy consumption. The previously stated figure for SPP’s total internal energy consumption of 41 999 MWh (151 195 GJ)

was adjusted to 34 982 MWh (125 934 GJ). At the same time, the data on the total internal energy consumption of the SPP Group was adjusted from 46 298 MWh to 39 281 MWh, the data on energy intensity based on revenues from 13.304 to 11.288, and the data on energy intensity based on operating profit from 0.282 to 0.240.

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 in the form of a 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
E5-6	Anticipated financial effects from resource use and circular economy-related risks and opportunities

In 2024, SPP adopted the comprehensive SPP Sustainability Strategy 2050. Through this strategy, the SPP Group set out targets focusing not only on aspects of business and the development of energy efficiency services and energy production from RES, but also on sustainable internal operations and other areas of responsible business. The SPP Group set out the targets listed in the SPP

Sustainability Strategy 2050 in a manner 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. The targets set out in the SPP Sustainability Strategy 2050 are general targets for reducing the impacts of the SPP Group and not all of them are targets as per the ESRS standards, which are described in individual chapters of this statement, where applicable. More information about the SPP Sustainability Strategy 2050 is presented in section SBM-1 Strategy, business model and value chain.

**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 comprises 5 members, of whom 2 members also hold executive positions in SPP, namely the position of CEO and a division director.

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 2025:

**CEO**

- Human Resources Section
- Corporate Communications Section
- Procurement and Purchasing Section
- Legal Section
- Regulation and Compliance Section
- Analytical Support Department
- Supervisory Board and Board of Directors Administration Department
- Trade Division
- Business and Marketing Division
- Finance Division

**Trade Division**

- Corporate Sales Section
- Mass Market Sales Section
- Trading Section
- Trade Automation and Digitalisation Section
- Back Office Section
- Trade Policy and Portfolio Management Section

**Business and Marketing Division**

- Marketing Section
- Business Development Section
- Management of Subsidiaries Section

**Finance Division**

- Accounting and Reporting Section
- Tax and Receivables Management Section
- Treasury Section
- Property Management Section
- IT Section
- Risk Management Department



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 are fully under the purview 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. 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 ties with any member of the senior management of SPP or a company wholly owned by SPP.

**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	2025	5	0	5	100	0	100
	2024	5	0	5	100	0	100
SPP Supervisory Board	2025	7	1	9*	78	11	89*
	2024	6	2	9*	67	22	89*
Board of Directors of SPP CZ	2025	3	0	3	100	0	100
	2024	3	0	3	100	0	100
Supervisory Board of SPP CZ	2025	3	0	3	100	0	100
	2024	2	0	3*	67	0	67*
Managing Directors of SPP CNG	2025	1	1	2	50	50	100
	2024	2	0	2	100	0	100

\* One seat in the Supervisory Board of SPP and SPP CZ was not filled.

At present, the Rules for Selecting SPP Bodies and the internal rules for electing members to the 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 benefits 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.

As of 31 December 2025, the bodies of SPP, SPP CZ, and SPP CNG were composed as follows:

**SPP Board of Directors:**

Ing. Juraj Ondris, MBA, Chairman of the Board of Directors  
 Ing. Martin Rybár, Vice-Chairman of the Board of Directors  
 Ing. Martin Húska, Member of the Board of Directors  
 JUDr. Vladimír Švigár, Member of the Board of Directors  
 Ing. Peter Bagin, 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. Martin Kohútik, Member of the Supervisory Board  
 Viera Uhrová, Member of the Supervisory Board  
 Ing. Miloš Dančo, Member of the Supervisory Board  
 Ing. Marek Mitterpák, PhD., Member of the Supervisory Board  
 Ing. Peter Vašítk, 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:**

gen. JUDr. Alexander Nejedlý, Chairman of the Supervisory Board  
 Mgr. 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. Alexandra Velická, PhD.

**Roles and responsibilities of administration, management, and supervisory bodies regarding aspects of sustainability 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.

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 revision,
- 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 out therein,
- d) monitoring SPP's impacts, sustainability risks, and the fulfilment of the SPP Sustainability Strategy 2050 and the targets set out therein,
- e) approving individual goals in the field of achieving SPP's sustainability as part of 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, the ESG and Public Affairs Manager, and senior employees of the SPP Group.

The management meeting of SPP is an advisory body to the CEO of SPP that deals with operational and conceptual issues relating to the company's activities and management, and it 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 Procurement and Purchasing 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 ESG and Public Affairs 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 mainly the following tasks:

- a) coordinates the system for reporting and documenting material impacts of the SPP Group's activities and for reporting non-financial information and the 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 to monitor 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 ESG and Public Affairs Manager participates in the meetings of the SPP Board of Directors and the management meeting of SPP, where 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 out 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 out 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 their 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, to support an active approach to achieving sustainability across the SPP Group, and to improve the 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 auditing.

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) assessment of impacts, risks and opportunities related to the activities of the SPP Group and the reporting of impacts of the SPP Group within individual topics,
- b) determination of targets reflecting the 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 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 an updated target, if its achievement is not possible even with additional measures and tasks.

SPP coordinates the monitoring of sustainability targets through the ESG and Public Affairs Manager, with other employees providing him/her with necessary collaboration. Senior employees of the SPP Group regularly (at least once a year or more often, where required) inform the ESG and Public Affairs Manager about the achievement status of SPP's sustainability targets. Senior employees of the SPP Group also regularly inform the ESG and Public Affairs 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 ESG and Public Affairs Manager informs the management meeting of SPP about the fulfilment status of targets, along with proposed measures and specific tasks necessary to implement the targets. At the same time, the ESG and Public Affairs Manager submits a report to the SPP Board of Directors on the monitoring of SPP's sustainability targets, at least once a year. If so required from the results of monitoring targets for achieving SPP's sustainability, the ESG and Public Affairs Manager submits to the SPP Board of Directors a proposed update to the SPP Sustainability Strategy 2050 and the targets set out 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 the 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 the material impacts, risks and opportunities of SPP's activities and the reporting of non-financial information is coordinated by the ESG and Public Affairs 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 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 ESG and Public Affairs

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 submits an alternative project setup that pursues the same targets but does not intensify 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 2025, 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 Resolution of the Government of the Slovak Republic No. 159/2011, as amended.

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 2025 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 achieving SPP's sustainability. Company-wide targets and individual targets for senior employees in achieving sustainability are linked to the ongoing reduction of 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 out therein.

In 2025, the share of targets in the field of achieving sustainability as part of company-wide targets set for all employees represented a weight of 20%. SPP's company-wide targets are set and evaluated by the SPP Board of Directors. In 2025, 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. In 2025, the SPP Board of Directors set the ESG targets for SPP CZ and SPP CNG, including a sustainability achievement target with a weight of 2-8%, depending on the position.

The sustainability achievement targets in 2025 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 significant to 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 establishment 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 for 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 E5, ESRS S1, 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 E5
- e) Monitoring the effectiveness of these measures and communication
  - ESRS E1, ESRS E5, ESRS S1

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 accordance with the Sustainability Management Programme, SPP has deployed a general register of sustainability risks that is subject to regular assessment. The risks related to implementation of the SPP Sustainability Strategy 2050 and the targets set out therein are also subject to regular assessment.

The scope of the risk assessment considers the risks in 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 activities of the SPP Group.

The management of risks relating to sustainability management, including the form, scope and procedure for 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 carried out 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, both current and expected risks and the 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 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 the management meeting of SPP. Subsequently, the comprehensive risk assessment is discussed twice a year at SPP Board of Directors meetings. 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 the framework of providing its core activity, i.e. the supply of gas and electricity, SPP did not identify any direct negative impacts on consumers and/or end users of its products.

In 2025, SPP employed a total of 786 persons in the Slovak Republic. More information on how many people were employed by the SPP Group in 2025 and their breakdown is provided in Chapter ESRS S1 Own Workforce.

Considering the more than 165 years of history of SPP, the supply of natural gas continued to play a significant role in its business. As the largest gas supplier in the Slovak Republic and the gas supplier of last resort, SPP is responsible for ensuring a sufficient supply 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 2025, SPP supplied the following energy volumes to customers in Slovakia and Czechia:

**Table 2 – Energy volumes 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	2025	30 020 512	3 000 586	785 309	7 857				
	2024	30 863 908	7 715 765	411 815	112 855				
SPP CNG	2025					69 886	663	15 159	924
	2024					70 643	618	10 158	500
SPP CZ	2025	6 620 393	908 828	40 206	64 000				
	2024	5 122 666	190 071	9 612	123 000				

\* Of SPP's quantity in 2025, 2 442 899 MWh comprised electricity supply to end customers. Of SPP's quantity in 2024, 1 877 322 MWh comprised 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.

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 funds collected in this way, SPP has built PVPPs at 21 schools worth a total of €580 000 since 2023, thanks to which these schools can use electricity from RES generated directly on site, thus saving on 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 reduce 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 2.4 million saplings in the protected forests of Slovakia.

**Table 3 – Total consolidated turnover of SPP and its breakdown**

Skupina SPP	Total consolidated turnover in € million	Total consolidated turnover from activities related to the supply of gas, electricity, and real estate rental in € million	Total consolidated turnover related to gas supply in € million
2025	3 030	3 030	2 436
2024	3 480	3 480	2 892

The year-on-year change in turnover was influenced by lower natural gas sales and electricity sales as a result of a drop in commodity prices on the markets.

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 was still the largest gas supplier in 2025, although the share of gas purchased under the long-term contract with this supplier fell to 30%. 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 2025, based on contracts concluded with major international suppliers.

SPP secures the supply of electricity via the 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 pursuing since 2020 continued in 2025 as well. As part of these activities, 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 key 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 biggest material impact, the reduction of which is the focus of the SPP Sustainability Strategy 2050 and the targets set out therein.

The SPP Group set out the targets listed in the SPP Sustainability Strategy 2050 in a manner 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. The targets set out in the SPP Sustainability Strategy 2050 are general targets for reducing the impacts of the SPP Group and not all of them are targets as per the ESRS standards, which are described in individual chapters of this statement, where applicable.

### 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 moving into 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.

Therefore, SPP adopted the comprehensive SPP Sustainability Strategy 2050 in 2024. Through this strategy, the SPP Group set out targets focusing not only on aspects of business and the development of energy efficiency services and energy production from RES, but also on sustainable internal operations and other areas of responsible business. At the beginning of 2026, the SPP Board of Directors adopted the update to the SPP Sustainability Strategy 2050, which took into account the challenges associated with demanding permit processes, on which the implementation of renewable electricity and gas production projects depends. SPP Sustainability Strategy 2050 sets out the following targets:

#### 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).
  - 1.2.2 By 2030, to operate biomethane production

- 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).
- 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 for reducing waste generation in SPP buildings.
- 2.2.6 To reduce greenhouse gas emissions from 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 revision 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, for 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 prioritise 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 To increase the share of women holding middle and top management positions in SPP by 2026.

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.

Reducing greenhouse gas emissions and other negative impacts associated with the supply of gas and electricity requires the comprehensive transformation of the energy sector and the entire economy. 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 consist primarily of 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, in the energy sector and the energy supply market, as well as from the direction of legislation in the field of sustainability.

The involvement of stakeholders serves to comprehend 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 subsequent 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 2 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 – our employee magazine and intranet. At the same time, SPP regularly collects suggestions from employees through employee surveys.

In 2025, SPP handled communication with almost 1.5 million customers across 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 designated 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 presenter at conferences focused on the energy sector and its transformation, where it reveals 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 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 considers the SPP Sustainability Strategy 2050 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 in 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.

### **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 conducts 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.

Compared to 2024, the range of material topics in SPP has narrowed slightly, as there has been a slight change in the assessment of severity and time horizon with selected topics based on an updated assessment of dual materiality and available data.

The scope of material topics was reviewed in the course of 2025. Following an internal review of the topics and their validation with external stakeholders, the topics of pollution, water and marine resources, biodiversity and ecosystems and affected communities were omitted in the compilation of the 2025 SPP Annual Report. SPP does not anticipate any significant adjustments to the carrying amounts of assets and liabilities in the coming year due to material risks and opportunities. The assessment that the sustainability impacts, opportunities and risks do not presently have a significant impact on the financial performance and cash flows of the SPP Group remains unchanged.

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 the '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 split 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 timescales broken down into short-term (1 year), medium-term (up to 5 years), and long-term (more than 5 years) horizons. SPP assessed the physical climate risks and transformation risks and opportunities for the first time in connection with the preparation of the 2024 SPP Annual Report, while these are regularly updated.

Given the nation-wide presence of SPP, in its assessment of climate risks SPP took into account the results of the analysis presented in the document "Review and Update to the National Climate Change Adaptation Strategy in Slovakia, Output 2.3: Assessment of Climate Risks and the Vulnerability of Slovakia" ("Assessment of Climate Risks and the Vulnerability of Slovakia")<sup>7</sup>. According to the Assessment of Climate Risks and the 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 heatwaves.

The Assessment of Climate Risks and the 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). In its financial statements, SPP does not give special consideration to climate scenarios used in sustainability reporting.

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 the 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 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 the Vulnerability of Slovakia identified one of the key risks as infrastructure and its disruption caused by extreme events. Publicly available information shows that some of these entities conducted an energy infrastructure resilience analysis, including the identification of planned expenditures for measures to increase the resilience of infrastructure to

<sup>7</sup> <https://www.klima-adapt.sk/narodna-adaptacna-strategia>

<sup>8</sup> ZSE Annual Report 2024 including consolidated reporting of sustainability information, particularly pages 54 to 66; <https://www.skupinazse.sk/Uvod/Spolocnost/Vyrocnne-spravy>.

extreme climate events and a commitment to adapt strategic plans to include also measures minimising the negative impacts of these risks. They also assessed that the electricity distribution activity meets the criteria set out in Appendix A to Commission Delegated Regulation (EU) 2021/2139.

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. In order to ensure the compatibility of SPP's assets, especially buildings, with the transition to a climate-neutral economy, SPP shall prepare a renovation plan for buildings in accordance with the SPP Sustainability Strategy 2050 with the aim of reducing energy consumption and greenhouse gas emissions related to their operation.

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, which identifies business development areas of SPP in order to ensure the compatibility of SPP's business model with the transition to a climate-neutral economy, also in terms of gradually reducing the amount of supplied gas and electricity (with no RES or nuclear origin guarantees), among others. However, if this is implemented, SPP may continue to supply gas within the framework of its obligations arising from its position as gas supplier of last resort or from other special tasks entrusted to it as an entity with exclusive state ownership. Although the climate scenario of limiting global warming to 1.5°C was not directly assessed as part of the analysis of risks and opportunities for transformation related to climate change, SPP assumes even with this scenario that in order to minimise risks and utilise transformation opportunities related to climate change, it will be necessary to implement measures identified by the SPP Sustainability Strategy 2050 and their implementation will need to be adapted to latest developments in risks and opportunities related to climate change.

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.

**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, promotion of the construction of photovoltaic sources for local electricity production from RES (PVPP), on-going 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 all 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 in 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 (the 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 in turn may significantly increase costs. Long-term reduced energy consumption by customers due to the adaptation to climate change impacts and lower company revenues.	M

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



**ESRS E5 Circular Economy**

Name/IRO	ESRS Sub-topic	Classification	Trigger	Description	Time horizon
Waste from internal operations	Waste	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 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.	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 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 encompasses ethical behaviour, transparency and integrity, shaping employees' attitudes toward ethical decision-making, corruption, adherence to rules and responsibility towards the company. A properly set corporate culture supports trust, inclusion, equal opportunities and open communication, which is key to the sustainability and goodwill of a company.	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, discrimination and respect for fundamental human rights. The corporate culture and values include also support for diversity and inclusion.	K
Corporate governance	Corporate culture	O	Corporate culture encompasses ethical behaviour, transparency and integrity, shaping employees' attitudes toward ethical decision-making, corruption, adherence to rules and responsibility towards the company. A properly set corporate culture supports trust, inclusion, equal opportunities and open communication, which is key to the sustainability and goodwill of a company.	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.	S

**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. Compared to 2024, the process of identifying and assessing significant topics has not changed in terms of fundamental steps or methodological principles. As in the previous reporting period, we followed the dual materiality principle in accordance with ESRS 2 and IRO-1. Unlike in 2024, when preparing this statement we omitted the topics of pollution, water and marine resources, biodiversity and ecosystems and affected communities, as there has been a slight change in the assessment of severity and the time horizon for selected topics based on available data. 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, we documented the subsidiaries, countries, locations or assets that were specifically considered through identification and assessment as part of sustainability disclosures.

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 by way of an online questionnaire where the topics were identified together with 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
<b>ESRS 2 General Disclosures</b>		<b>31</b>
BP-1	General basis for preparation of the sustainability statements	31
BP-2	Disclosures in relation to specific circumstances	31-32
GOV-1	The role of the administrative, management and supervisory bodies	32-35
GOV-2	Information provided to and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies	35-36
GOV-3	Integration of sustainability-related performance in incentive schemes	36
GOV-4	Statement on due diligence	36
GOV-5	Risk management and internal controls over sustainability reporting	37
SBM-1	Strategy, business model and value chain	37-40
SBM-2	Interests and views of stakeholders	40-41
SBM-3	Material impacts, risks and opportunities and their interaction with the strategy and business model	41-44, phasing-in transitional provisions applied to a portion of expected impacts
IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	44-45
IRO-2	Disclosure requirements in ESRS covered by the undertaking’s sustainability statement	45-46

Disclosure requirement		Page or explanation
<b>ESRS E1 Climate Change</b>		<b>60</b>
E1-1	Transition plan for climate change mitigation	61
E1-2	Policies related to climate change mitigation and adaptation	62
E1-3	Actions and resources in relation to climate change policies	62
E1-4	Targets related to climate change mitigation and adaptation	62-63
E1-5	Energy consumption and mix	63-65
E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	66-69
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.	69, not material, therefore not disclosed
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
<b>ESRS E5 Resource use and circular economy</b>		<b>69</b>
E5-1	Policies related to resource use and circular economy	69-70
E5-2	Actions and resources related to resource use and circular economy	70
E5-3	Targets related to resource use and circular economy	71
E5-4	Resource inflows	Not applicable to the SPP Group
E5-5	Resource outflows	71-72
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
<b>ESRS S1 Own workforce</b>		<b>73</b>
S1-1	Policies related to own workforce	73-74
S1-2	Processes for engaging with own workers and workers' representatives about impacts	74
S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	74
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	74-75
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	75
S1-6	Characteristics of the undertaking's employees	75-77
S1-7	Characteristics of non-employee workers in the undertaking's own workforce	77
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Disclosure requirement		Page or explanation
<b>ESRS S4 Consumers and end-users</b>		<b>82</b>
S4-1	Policies related to consumers and end-users	82-83
S4-2	Processes for engaging with consumers and end-users about impacts	83
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	83
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	84
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	85

Disclosure requirement		Page or explanation
<b>ESRS G1 Business conduct</b>		<b>85</b>
G1-1	Corporate culture and business conduct policies and corporate culture	85-86
G1-2	Management of relationships with suppliers	86
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G1-4	Confirmed incidents of corruption or bribery	87
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## Environmental Information

### 12.3. 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 2025.**

The information about the proportion of turnover, capital expenditures, and operating expenditures of SPP for the year ended 31 December 2025 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 2025 and activities defined as Taxonomy-eligible economic activities, as defined and set out in the Climate Delegated Act<sup>9</sup> (Annex I – Climate Change Mitigation and Annex II – Climate Change Adaptation), the Supplemental Delegated Act<sup>10</sup> as regards specific public disclosures for certain energy sectors, and in the Environmental Delegated Act.<sup>11</sup>

Based on this assessment, the SPP Group identified a match between the activities implemented in 2025 and activities that are eligible in relation to the environmental objective of climate change mitigation, summarised in Table 5 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 5 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 4. The activities listed in Table 5 below contribute to the turnover, capital expenditures, and operating expenditures of SPP.

<sup>9</sup> 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”)

<sup>10</sup> 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”)

<sup>11</sup> 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 “Environmental Delegated Act”)

**Table 4 – Proportion of Taxonomy-eligible and Taxonomy-aligned economic activities in total turnover, capital expenditures and operating expenditures**

FY ending 31 Dec 2025	Total (€ million)	Proportion of Taxonomy-eligible (non-aligned) economic activities (%)	Proportion of Taxonomy-aligned economic activities (%)	Proportion of Taxonomy-non-eligible economic activities (%)
Turnover	3 029.75	0.31%	0.00%	99.69%
Capital expenditures	11.32	0.00%	6.27%	93.73%
Operating expenditures	5.27	28.85%	0.31%	70.84%

**Table 5 – Taxonomy-eligible economic activities**

Economic activity	Description	Relevant to KPI	NACE code
4.1 Electricity generation using solar photovoltaic technology	Electricity generation using solar photovoltaic technology for our own consumption, as well as external customers	Turnover, 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
4.10 Electricity storage	Construction and operation of a battery storage facility in Spišská Belá	Capital expenditures	-
4.30 High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	Operation of a co-generation and tri-generation unit for combined production of electricity, heat and cooling for our own consumption, as well as for external customers	Turnover, 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 our vehicle fleet	Operating expenditures	N77.11
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, 4.3 Electricity generation from wind power and 4.10 Electricity generation using solar photovoltaic technology, 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.<sup>12</sup> With these three 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 2025, SPP invested 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 as part of partnership projects with school operators). The equipment placed on the roofs of buildings should produce electricity for direct consumption at the site 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 2025, 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, at the preparation stage of environmental studies, or at 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.

In 2025, SPP implemented a battery storage project (electricity storage facility) with an output of around 4 MW at its site in Spišská Belá, which is expected to be launched into operation in 2026.

When analysing the technical criteria, SPP assessed projects for electricity generation using solar photovoltaic technology or wind power and the battery storage project, 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.<sup>13</sup> 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, we avoided duplicate counting of items in turnover indicators, capital expenditures, and operating expenses under individual economic activities by setting up internal processes, including the exclusion of transactions between companies of the SPP Group.

<sup>12</sup> Carbon Neutrality in the UNECE Region: Integrated Life-cycle Assessment of Electricity Sources, United Nations, 2022.

<sup>13</sup> 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.

### 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 2025, this 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 2025 cannot be classified as Taxonomy-eligible or even Taxonomy-aligned.

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

**Table 6 – 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 yes/no	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				
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																			
<b>A.1 Environmentally sustainable activities (Taxonomy-aligned)</b>																			
Electricity generation using solar photovoltaic technology	CCM 4.1	0.07	0.00%	100.00%	0.00%						-	yes	-	yes	-	yes	yes	0.00%	
<b>Turnover from environmentally sustainable activities (Taxonomy-aligned) (A.1)</b>		0.07	0.00%															0.00%	
<b>A.2 Taxonomy-eligible but not environmentally sustainable activities (Taxonomy-non-aligned)</b>																			
High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	CCM 4.30	0.52	0.02%															0.01%	
Acquisition and ownership of buildings	CCM 7.7	8.77	0.29%															0.26%	
<b>Turnover from Taxonomy-eligible but not environmentally sustainable activities (Taxonomy-non-aligned) (A.2)</b>		9.28	0.31%															0.27%	
<b>Total turnover from Taxonomy-eligible activities (A.1 + A.2) (A)</b>		9.35	0.31%															0.27%	
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																			
<b>Turnover from Taxonomy-non-eligible activities (B)</b>		3 020.40	99.69%	<b>Environmental objectives:</b> (1) Climate change mitigation (2) Climate change adaptation (3) Water and marine resources (4) Pollution prevention and control (5) Circular economy (6) Biodiversity												99.73%			
<b>Total (A+B)</b>		3 029.75	100.00%													100.00%			

The year-on-year decline in the total turnover of the SPP Group was caused in 2025 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 the majority of the SPP Group's turnover. SPP reported turnover from activity 4.1 Electricity generation using solar photovoltaic technology for the first time in 2025. The turnover from activity 4.30 High-efficiency co-generation of heat/cool and power from fossil gaseous fuels increased year-on-year, mainly due to higher electricity production. 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 previous periods and their decrease in the subsequent 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.

**Table 7 – Quantitative breakdown of the turnover numerator**

	€ million
Rental revenues	8.77
Revenues from customer contracts	0.58
Other revenues	0
<b>Total</b>	<b>9.35</b>

## 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 2025.

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, the row 'Additions', the column 'Total' in the Notes to the Consolidated Financial Statements of SPP.

In 2025, SPP implemented activities related to the following Taxonomy-eligible economic activities:

- photovoltaic projects at SPP sites and selected schools in Slovakia, to enable the schools to use electricity produced directly from RES and so reduce their current electricity costs by an average of 30%,
- battery storage facility project in Spišská Belá,
- preparatory stage of projects for the production of electricity from wind power, which SPP plans to implement.

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 of the 5-year Strategic Plan of SPP for the 2025-2029 period and the SPP Business Plan 2025, which are both 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. Total planned capital expenditures in 2025 covered actual capital expenditures in 2025.

In 2025, the Taxonomy-aligned economic activity comprised either completed or planned projects for local electricity sources from solar and wind power, as well as the battery storage facility project in Spišská Belá. 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 gradually be put into operation in the coming years.

**Table 8 – 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-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					
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																				
<b>A.1 Environmentally sustainable activities (Taxonomy-aligned)</b>																				
Electricity generation using solar photovoltaic technology	CCM 4.1	0.26	2.33%	100.00%	0.00%						-	yes	-	yes	-	yes	yes	10.02%	-	-
Electricity generation from wind power	CCM 4.3	0.08	0.70%	100.00%	0.00%						-	yes	-	yes	-	yes	yes	0.82%		
Electricity storage	CCM 4.10	0.37	3.23%	100.00%	0.00%						-	yes	-	yes	-	yes	yes	-		
<b>CapEx from environmentally sustainable activities (Taxonomy-aligned) (A.1)</b>		<b>0.71</b>	<b>6.27%</b>	<b>100.00%</b>	<b>0.00%</b>						<b>-</b>	<b>yes</b>	<b>-</b>	<b>yes</b>	<b>-</b>	<b>yes</b>	<b>yes</b>	<b>10.84%</b>	<b>-</b>	<b>-</b>
<b>A.2 Taxonomy-eligible but not environmentally sustainable activities (Taxonomy-non-aligned)</b>																				
High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	CCM 4.30	0.00	0.00%															0.00%		
<b>CapEx from Taxonomy-eligible but not environmentally sustainable activities (Taxonomy-non-aligned) (A.2)</b>		<b>0.00</b>	<b>0.00%</b>															<b>0.00%</b>		
<b>Total CapEx from Taxonomy-eligible activities (A.1 + A.2) (A)</b>		<b>0.71</b>	<b>6.27%</b>															<b>10.84%</b>		
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																				
<b>CapEx from Taxonomy-non-eligible activities (B)</b>		<b>10.61</b>	<b>93.73%</b>	<b>Environmental objectives:</b> (1) Climate change mitigation (2) Climate change adaptation (3) Water and marine resources (4) Pollution prevention and control (5) Circular economy (6) Biodiversity												<b>89.16%</b>				
<b>Total (A+B)</b>		<b>11.32</b>	<b>100.00%</b>													<b>100.00%</b>				

The year-on-year increase in total capital expenditures of the SPP Group in 2025 compared to 2024 was caused by the fact that more significant investments were made in 2025 in the field of redesign of customer centres, as well as in information infrastructure.

On the contrary, eligible capital expenditures decreased year-on-year, despite the addition of activity 4.10. Electricity storage and a significant investment into the creation of a battery storage facility in Spišská Belá, with this mainly due to the fact that development investments were made in 2025 to a smaller extent in the field of construction under activity 4.1. Electricity production using solar photovoltaic technology (in 2024, PVPPs were implemented at several elementary schools, as well as at the SPP site in Michalovce). Capital expenditures for activity 4.3 Electricity generation from wind power increased year-on-year thanks to the active development of multiple wind park projects. In 2025, SPP did not record any capital expenditures in activity 4.30 High-efficiency co-generation of heat/cool and power from fossil gaseous fuels.

**Table 9 – Quantitative breakdown of the numerator of capital expenditures on economic activities (in € million)**

	<b>Additions to real estates, machinery and equipment</b>	<b>Internally generated intangible or acquired assets</b>	<b>Leases (capitalised assets with the right of use)</b>	<b>Total €</b>
4.1 Electricity generation using solar photovoltaic technology	0.26	0	0	0.26
4.3 Electricity generation from wind power	0.08	0	0	0.08
4.10. Electricity storage	0.37	0	0	0.37
<b>TOTAL</b>	0.71	0.00	0.00	0.71

### 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). Operating expenses under the EU Taxonomy include expenses associated with the maintenance and repair of buildings, machinery and 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 either completed or planned represent a Taxonomy-aligned economic activity. The numerator comprises limited operating expenditures associated with their implementation. Operating expenditures associated with the 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.

**Table 10 – Operating 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-1 %	Category (enabling activity)	Category (transitional activity)
				(1) %	(2) %	(3) %	(4) %	(5) %	(6) %	(1) yes/ nie	(2) yes/ nie	(3) yes/ nie	(4) yes/ nie	(5) yes/ nie	(6) yes/ nie				
<b>A. TAXONOMY-ELIGIBLE ACTIVITIES</b>																			
<b>A.1 Environmentally sustainable activities (Taxonomy-aligned)</b>																			
Electricity generation using solar photovoltaic technology	CCM 4.1	0.02	0.31%	100.00%	0.00%							yes		yes		yes	yes	0.13%	
<b>OpEx from environmentally sustainable activities (Taxonomy-aligned) (A.1)</b>		0.02	0.31%	100.00%	0.00%													0.13%	
<b>A.2 Taxonomy-eligible but not environmentally sustainable activities (Taxonomy-non-aligned)</b>																			
Transport by motorbikes, passenger cars and commercial vehicles	CCM 6.5	0.45	8.54%															8.44%	
Acquisition and ownership of buildings	CCM 7.7	0.85	16.18%															15.17%	
High-efficiency co-generation of heat/cool and power from fossil gaseous fuels	CCM 4.30	0.22	4.12%															7.14%	
<b>OpEx from Taxonomy-eligible but not environmentally sustainable activities (Taxonomy-non-aligned) (A.2)</b>		1.52	28.85%															30.75%	
<b>Total OpEx from Taxonomy-eligible activities (A.1 + A.2) (A)</b>		1.54	29.16%															30.88%	
<b>B. TAXONOMY-NON-ELIGIBLE ACTIVITIES</b>																			
<b>OpEx from Taxonomy-non-eligible activities (B)</b>		3.73	70.84%	<b>Environmental objectives:</b> (1) Climate change mitigation (2) Climate change adaptation (3) Water and marine resources (4) Pollution prevention and control (5) Circular economy (6) Biodiversity												69.12%			
<b>Total (A+B)</b>		5.27	100.00%													100.00%			

In 2025, total operating expenditures of the SPP Group did not change significantly year-on-year. Higher year-on-year operating expenditures for activity 7.7 Acquisition and ownership of buildings, were caused by greater implementation of activities in the field of operation and maintenance. Year-on-year lower operating expenditures for activity 4.30 High-efficiency co-generation of heat/cool and power from fossil gaseous fuels, were caused by repairs to a 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 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.

**Table 11 – Quantitative breakdown of the operating expenditures numerator**

	€ million
Maintenance and repairs	1.07
Costs of short-term leasing and leasing of low-value assets	0.45
Other services	0.02
<b>TOTAL</b>	<b>1.54</b>

**Table 12 – Proportion of fossil gas related activities in Turnover KPI, Capital expenditures KPI, and Operating expenditures KPI**

<b>Nuclear-related activities</b>	
The undertaking conducts or finances research, development, demonstration and deployment of innovative electricity generation facilities, in which energy from nuclear processes is produced with minimal fuel cycle waste, or it has exposure to research, development, demonstration or deployment thereof.	NO
The undertaking executes or finances the construction and safe operation of new nuclear installations for electricity generation or heat processing, including for the purposes of central heating supply or industrial processes, such as hydrogen production, while raising their safety using the best available technologies, or it has exposure to construction or safe operation thereof.	NO
The undertaking executes or finances the safe operation of existing nuclear installations, in which electricity is generated or heat is processed, including for the purposes of central heating supply or industrial processes, such as hydrogen production from nuclear energy, while raising their safety, or it has exposure to safe operation thereof.	NO
<b>Fossil gas related activities</b>	
The undertaking executes or finances the construction or operation of electricity generation facilities in which electricity is produced with the use of fossil gaseous fuels, or it has exposure to construction or operation thereof.	NO
The undertaking executes or finances the construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels, or it has exposure to construction, refurbishment or operation thereof.	YES
The undertaking executes or finances the construction, refurbishment or operation of heat generation facilities, in which heat/cool is produced with the use of fossil gaseous fuels, or it has exposure to construction, refurbishment or operation thereof.	NO

<b>Taxonomy-aligned economic activities (turnover denominator)</b>	Amount and proportion					
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
	Amount (EUR million)	%	Amount (EUR million)	%	Amount (EUR million)	%
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.26 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.27 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.28 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.29 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.30 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.31 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of other Taxonomy-aligned economic activities not listed in rows 1 to 6 in the denominator of the relevant KPI	0.07	0.00%	0.07	0.00%	0.00	0.00
<b>Total relevant KPI</b>	<b>3 029.75</b>	<b>100.00%</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

<b>Taxonomy-aligned economic activities (CapEx denominator)</b>	Amount and proportion					
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
	Amount (EUR million)	%	Amount (EUR million)	%	Amount (EUR million)	%
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.26 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.27 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.28 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.29 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.30 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.31 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of other Taxonomy-aligned economic activities not listed in rows 1 to 6 in the denominator of the relevant KPI	0.71	6.27%	0.71	6.27%	0.00	0.00
<b>Total relevant KPI</b>	<b>11.32</b>	<b>100.00%</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

Taxonomy-aligned economic activities (OpEx denominator)	Amount and proportion					
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
	Amount (EUR million)	%	Amount (EUR million)	%	Amount (EUR million)	%
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.26 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.27 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.28 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.29 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.30 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.31 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of other Taxonomy-aligned economic activities not listed in rows 1 to 6 in the denominator of the relevant KPI	0.02	0.31%	0.02	0.31%	0.00	0.00
<b>Total relevant KPI</b>	5.27	100.00%	0.00	0.00	0.00	0.00

Taxonomy-aligned economic activities (turnover numerator)	Amount and proportion					
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
	Amount (EUR million)	%	Amount (EUR million)	%	Amount (EUR million)	%
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.26 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.27 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.28 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.29 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.30 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.31 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of other Taxonomy-aligned economic activities not listed in rows 1 to 6 in the numerator of the relevant KPI	0.07	100.00%	0.00	0.00	0.00	0.00
<b>Total amount and proportion of Taxonomy-aligned economic activities in the numerator of the relevant KPI</b>	0.07	100.00%	0.00	0.00	0.00	0.00

Taxonomy-aligned economic activities (CapEx numerator)	Amount and proportion					
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
	Amount (EUR million)	%	Amount (EUR million)	%	Amount (EUR million)	%
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.26 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.27 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.28 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.29 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.30 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.31 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of other Taxonomy-aligned economic activities not listed in rows 1 to 6 in the numerator of the relevant KPI	0.71	100.00%	0.00	0.00	0.00	0.00
<b>Total amount and proportion of Taxonomy-aligned economic activities in the numerator of the relevant KPI</b>	0.71	100.00%	0.00	0.00	0.00	0.00

Taxonomy-aligned economic activities (OpEx numerator)	Amount and proportion					
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
	Amount (EUR million)	%	Amount (EUR million)	%	Amount (EUR million)	%
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.26 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.27 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.28 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.29 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.30 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-aligned economic activity listed in section 4.31 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of other Taxonomy-aligned economic activities not listed in rows 1 to 6 in the numerator of the relevant KPI	0.02	100.00%	0.00	0.00	0.00	0.00
<b>Total amount and proportion of Taxonomy-aligned economic activities in the numerator of the relevant KPI</b>	0.02	100.00%	0.00	0.00	0.00	0.00

Taxonomy-eligible but not Taxonomy-aligned economic activities (turnover numerator)	Amount and proportion					
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
	Amount (EUR million)	%	Amount (EUR million)	%	Amount (EUR million)	%
Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity listed in section 4.26 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity listed in section 4.27 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity listed in section 4.28 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity listed in section 4.29 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity listed in section 4.30 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.52	5.56%	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity listed in section 4.31 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00%	0.00	0.00	0.00	0.00
Amount and proportion of other Taxonomy-eligible but not Taxonomy-aligned economic activities not listed in rows 1 to 6 in the numerator of the relevant KPI	8.77	94.44%	0.00	0.00	0.00	0.00
<b>Total amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activities in the numerator of the relevant KPI</b>	<b>9.28</b>	<b>100.00%</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

Taxonomy-eligible but not Taxonomy-aligned economic activities (CapEx numerator)	Amount and proportion					
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
	Amount (EUR million)	%	Amount (EUR million)	%	Amount (EUR million)	%
Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity listed in section 4.26 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity listed in section 4.27 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity listed in section 4.28 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity listed in section 4.29 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity listed in section 4.30 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity listed in section 4.31 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of other Taxonomy-eligible but not Taxonomy-aligned economic activities not listed in rows 1 to 6 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activities in the numerator of the relevant KPI</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

Taxonomy-eligible but not Taxonomy-aligned economic activities (OpEx numerator)	Amount and proportion					
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
	Amount (EUR million)	%	Amount (EUR million)	%	Amount (EUR million)	%
Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity listed in section 4.26 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity listed in section 4.27 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity listed in section 4.28 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity listed in section 4.29 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity listed in section 4.30 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.22	14.29%	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activity listed in section 4.31 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the numerator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of other Taxonomy-eligible but not Taxonomy-aligned economic activities not listed in rows 1 to 6 in the numerator of the relevant KPI	1.30	85.71%	0.00	0.00	0.00	0.00
<b>Total amount and proportion of Taxonomy-eligible but not Taxonomy-aligned economic activities in the numerator of the relevant KPI</b>	<b>1.52</b>	<b>100.00%</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

Taxonomy-non-eligible economic activities (turnover denominator)	Amount and proportion					
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
	Amount (EUR million)	%	Amount (EUR million)	%	Amount (EUR million)	%
Amount and proportion of Taxonomy-non-eligible economic activity listed in section 4.26 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-non-eligible economic activity listed in section 4.27 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-non-eligible economic activity listed in section 4.28 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-non-eligible economic activity listed in section 4.29 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-non-eligible economic activity listed in section 4.30 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-non-eligible economic activity listed in section 4.31 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of other Taxonomy-non-eligible economic activities not listed in rows 1 to 6 in the denominator of the relevant KPI	3 020.40	100.00%	0.00	0.00	0.00	0.00
<b>Total amount and proportion of Taxonomy-non-eligible economic activities in the denominator of the relevant KPI</b>	<b>3 020.40</b>	<b>100.00%</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

Taxonomy-non-eligible economic activities (CapEx denominator)	Amount and proportion					
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
	Amount (EUR million)	%	Amount (EUR million)	%	Amount (EUR million)	%
Amount and proportion of Taxonomy-non-eligible economic activity listed in section 4.26 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-non-eligible economic activity listed in section 4.27 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-non-eligible economic activity listed in section 4.28 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-non-eligible economic activity listed in section 4.29 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-non-eligible economic activity listed in section 4.30 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-non-eligible economic activity listed in section 4.31 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of other Taxonomy-non-eligible economic activities not listed in rows 1 to 6 in the denominator of the relevant KPI	10.61	100.00%	0.00	0.00	0.00	0.00
<b>Total amount and proportion of Taxonomy-non-eligible economic activities in the denominator of the relevant KPI</b>	10.61	100.00%	0.00	0.00	0.00	0.00

Taxonomy-non-eligible economic activities (OpEx denominator)	Amount and proportion					
	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
	Amount (EUR million)	%	Amount (EUR million)	%	Amount (EUR million)	%
Amount and proportion of Taxonomy-non-eligible economic activity listed in section 4.26 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-non-eligible economic activity listed in section 4.27 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-non-eligible economic activity listed in section 4.28 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-non-eligible economic activity listed in section 4.29 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-non-eligible economic activity listed in section 4.30 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of Taxonomy-non-eligible economic activity listed in section 4.31 of Annexes I and II to Commission Delegated Regulation 2021/2139 in the denominator of the relevant KPI	0.00	0.00	0.00	0.00	0.00	0.00
Amount and proportion of other Taxonomy-non-eligible economic activities not listed in rows 1 to 6 in the denominator of the relevant KPI	3.73	100.00%	0.00	0.00	0.00	0.00
<b>Total amount and proportion of Taxonomy-non-eligible economic activities in the denominator of the relevant KPI</b>	3.73	100.00%	0.00	0.00	0.00	0.00

## 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),<sup>14</sup>
- UN Guiding Principles on Business and Human Rights (UNGP)<sup>15</sup>, 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 Work<sup>16</sup>, and
- International Bill of Human Rights.<sup>17</sup>

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

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.



## 12.4. 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 (the 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 in turn 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 our 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.

<sup>14</sup> <https://www.oecd.org/daf/inv/mne/48004323.pdf>

<sup>15</sup> [https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)

<sup>16</sup> [https://www.ilo.org/wcmsp5/groups/public/---ed\\_norm/---declaration/documents/normativeinstrument/wcms\\_716594.pdf](https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/normativeinstrument/wcms_716594.pdf)

<sup>17</sup> <https://www.ohchr.org/sites/default/files/Documents/Publications/Compilation1.1en.pdf>

## E1-1 Transition plan for climate change mitigation

In the interest of reducing negative impacts, in 2024 the SPP Board of Directors adopted the SPP Sustainability Strategy 2050, focusing on climate change transformation measures, among others. 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, among other issues, the SPP Group will take into account 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, additionally through a higher supply of gas with guarantees of RES origin and supply 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. 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 ensures that projects such as wind power generation projects 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 under EU rules in the chapter EU Taxonomy compliant reporting of sustainable investments, 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 on implemented facilities amounting to approximately €263 000 in 2025 (lower than 2024 due to a lower number and scope of implemented projects), 4.3 Electricity generation from wind power with capital expenditures spent in 2025 mainly on parts of projects within preparatory stages of wind farms for the amount of approximately €80 000 (on approximately the same

level as in 2024) and 4.10 Electricity storage with capital expenditures spent in 2025 on the implementation of a battery storage facility in Spišská Belá amounting to approximately €365 000 (no capital expenditures were spent on this activity in 2024).

SPP builds facilities throughout Slovakia to generate 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 is developing projects for the production of electricity from wind power with a planned output of over 460 MW at multiple 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, at the stage of compiling environmental studies or at the stage of preparing the application for EIA assessment. SPP is also interested in participating in the implementation of wind farms as part of the so-called acceleration zones.

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.

As concerns economic activities related to coal, oil and gas, SPP spent €230 000 of CapEx on the supply, manufacture and installation of technology parts for CNG or LNG stations in 2025.

By itself or through its subsidiaries, SPP achieved the following progress in 2025 in implementing the SPP Sustainability Strategy 2050:

- The share of electricity supplied from RES in the total electricity supply to end customers came to 32%.
- In 2025, SPP produced 924 MWh of electricity from RES in its own PVPPs in Michalovce and on the roofs of buildings at SPP sites.
- SPP built a battery storage facility in 2025 with an output of about 4 MW at its site in Spišská Belá and we expect its launch into operation in 2026.
- The company moved ahead with the development of wind park projects in 2025, 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 2025, ESCO Slovensko also implemented for its customers PVPPs with a total output of 14 MWp (other PVPPs with an output of 3 MWp were implemented in 2024).
- As part of the Energy and Biological Waste Recovery Centre (EBWRC) projects and together with its partner – BRANTNER, SPP launched an optical sorting line into operation in 2025 as the first stage of EBRWC Nové Zámky (in total, the line sorted more than 15 000 tonnes of plastic waste), while also initiating the procurement of technology for the biological stage.
- With respect to the Clean Electricity from SPP service, by which customers also contribute to the construction of PVPPs at schools, SPP had launched local PVPPs into operation at 21 schools by the end of 2025 and began preparing the construction of additional 8 PVPPs at schools.
- 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 2.4 million new trees since 2020.

**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 focus on implementing measures to reduce the negative impacts of SPP and, ultimately, on 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 the 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 for 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 can be 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 2025 or projects under preparation to reduce greenhouse gas emissions is as follows:

1. The sale of electricity with RES and nuclear origin guarantees produced annual savings of 326 043 tonnes of CO<sub>2</sub>e in 2025.

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). The SPP Group supplies electricity with RES or nuclear origin guarantees to households and commercial sector customers.

2. The expected annual electricity production from implemented PVPP projects in 2023 and 2025 with an output of 18.357 MW, approximately 18.35 GWh, brings annual savings of 6 135 tonnes of CO<sub>2</sub>e.

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 reported period, SPP implemented and operated PVPPs at its own sites with an output of 878.7 kWp and, at the same time, implemented 21 PVPPs at schools across Slovakia between 2023 and 2025 as part of the service Clean Electricity from SPP, while initiating the preparation of additional 8 PVPPs at schools.

Moreover, ESCO Slovensko implemented PVPPs for its customers with an output of 14 MWp in 2025 (additional PVPPs with an output of 3 MW were implemented in 2024), which are 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 by the planned 200 MW wind power projects is to generate annual savings of 167 165 tonnes of CO<sub>2</sub>e.
4. The expected annual biomethane production of 200 GWh by the planned projects is to generate annual savings of 40 400 tonnes of CO<sub>2</sub>e.

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.

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. The expected launch date of the first biological stage with biomethane production is 2028.

The emission factors of electricity from the residual energy mix in the Slovak Republic of 334.33 g CO<sub>2</sub>e/kWh in 2024, the residual energy mix in the Czech Republic of 584.07 g CO<sub>2</sub>e/kWh in 2024 and the zero emission factor of electricity produced from RES or nuclear, were taken into account when calculating the benefit.

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 of reducing 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 2025 (39 345 MWh) being approximately 40% lower than in 2010 (65 464 MWh). However, compared to the base year of 2024 (35 485 MWh), SPP's gas consumption increased slightly, mainly due to the weather conditions (higher consumption for heating in winter and cooling in summer).
2. Greenhouse gas emissions from SPP's activities are mainly influenced by the total amount of gas and electricity sold to customers. The SPP Group has significantly reduced the total amount of sold gas in recent years with total quantity of supplied gas in 2025 (36 TWh) being approximately 35% lower than in 2010 (55.4 TWh).

3. Greenhouse gas emissions from the SPP Group's activities in 2024 were also greatly affected by special obligations, such as the provision of electricity at preferential prices for households, totalling about 5.5 TWh of electricity. As the specific obligations of SPP related to the provision of electricity to other suppliers for households at preferential prices was discontinued in 2025, total greenhouse gas emissions fell by more than 1 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 Chapter ESRS E1 - Climate Change, section E1-2 Policies related to climate change mitigation and adaptation.

### **E1-5 Energy consumption and mix**

Efficient energy use and energy savings comprise a key element of efficient internal operation at SPP. We monitor and assess our internal energy consumption. In 2025, we continued applying 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 recent years, such as working from home. Despite these measures, energy consumption increased in 2025 mainly due to weather conditions (higher consumption for heating in winter and cooling in summer), rising year-on-year from a record low in 2024.

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. In 2025, we produced 10.335 GWh of electricity and 13.328 GWh of heat. Total electricity and heat production was higher than in 2024 (9.13 GWh of electricity and 11.5 GWh of heat) due to colder weather during the heating season and warmer weather in the summer, when we needed to produce a larger amount of heat to produce a larger amount of cold in absorption units for providing air conditioning to administrative premises. Natural gas is the energy production source used at the CHP plant, with it reaching an efficiency of 79.56% in 2025.

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 the 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 84% of SPP's total direct internal gas consumption.

In 2025, we launched the operation of smaller PVPPs on the roofs of buildings and on land at SPP sites with an output of 879.9 kWp. In 2025, these sources produced 924 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 the reported and previous period:

**Table 13 – Internal electricity, gas, heat and fuel consumption of the SPP Group**

MWh		Diesel*	Electricity**	Gas	(of which sold heat)	Heat	Total
SPP	2025	32		39 345	-1 012		<b>38 365</b>
	2024	38		35 485	- 541		<b>34 982</b>
SPP CNG	2025		1 448	2 670		44	<b>4 162</b>
	2024		1 484	2 711		41	<b>4 236</b>
SPP CZ	2025		34			29	<b>63</b>
	2024		34			29	<b>63</b>
GJ		Diesel*	Electricity**	Gas	(of which sold heat)	Heat	Total
SPP	2025	115		141 642	- 3 643		<b>138 114</b>
	2024	136		127 746	- 1 948		<b>125 934</b>
SPP CNG	2025		5 213	9 612		157	<b>14 982</b>
	2024		5 342	9 758		149	<b>15 249</b>
SPP CZ	2025		122			104	<b>226</b>
	2024		122			104	<b>226</b>

\* Diesel used only by generators for other than transport purposes (fuel consumption for transport purposes is shown in Table 16).

\*\* Electricity consumed by SPP is produced in the CHP plant, while the energy is also included in SPP's internal gas consumption. This internal electricity consumption reached 6 346 MWh in 2025 and 7 017 MWh in 2024.

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 14 – Energy intensity of the SPP Group based on revenues and operating profit**

SPP Group	Total internal consumption in MWh	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
2025	42 590	3 030	146	14.056	0.292
2024*	39 281	3 480	164	11.288	0.240

\* Adjusted 2024 values are caused by the fact that electricity consumed by SPP is generated at the CHP plant, and the energy is also included in SPP's internal gas consumption. Hence, the electricity consumed by SPP was deducted from total energy consumption, including for 2024.

**Table 15 – Own electricity production**

	Total own electricity production in MWh	Own electricity production in MWh (source: gas)	Own electricity production in MWh (source: PVPP)	Own electricity production in MWh (source: wind)	Own electricity production in MWh (source: others)
2025	11 259	10 335	924	0	0
2024	9 610	9 134	476	0	0

The above data show 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 the charging infrastructure for electromobility. At the end of 2025, 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 are DC charging points). In 2024, the SPP Group had the following fuel consumption in transport:

**Table 16 – Internal fuel consumption in transport of the SPP Group**

		2025	2024			2025	2024
<b>Diesel (l)</b>	SPP	51 114	42 964	<b>Diesel* (GJ)</b>	SPP	1 840	1 547
	SPP CZ	21 958	17 466		SPP CZ	790	629
	SPP CNG				SPP CNG		
<b>Petrol (l)</b>	SPP	132 472	117 745	<b>Petrol** (GJ)</b>	SPP	4 239	3 768
	SPP CZ	4 141	3 744		SPP CZ	133	120
	SPP CNG	466	450		SPP CNG	15	14
<b>CNG (kg)</b>	SPP	5 865	11 745	<b>CNG*** (GJ)</b>	SPP	265	530
	SPP CZ	0	746		SPP CZ	0	34
	SPP CNG	11 470	12 756		SPP CNG	517	575

\* The value of energy content by weight (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 value of energy content by weight (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 value of energy content by 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.

The increases in diesel and gasoline consumption and the decrease in CNG consumption were caused by an overall increase in the number of vehicles used by SPP and by the fact that retired CNG vehicles were replaced by vehicles using other propulsion systems (new passenger CNG vehicles are no longer being produced).

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

**Table 17 – Gross Scopes 1, 2, 3 and Total GHG emissions**

	Retrospectively				Scopes and deadlines			
	2024	Comparison	2025	% N/ N-1	2025	2030	(2050)	Annual % target/base year
<b>GHG emissions in Scope 1</b>								
Gross GHG emissions in Scope 1 (tCO <sub>2</sub> e)	8 306	817	9 123	110	9 123	N/A	N/A	N/A
Scope 1 percentage Greenhouse gas emissions from regulated emissions trading (%)	N/A	N/A	0	N/A	0	N/A	N/A	N/A
<b>GHG emissions in Scope 2</b>								
Gross GHG emissions in Scope 2 as per the location-based method (tCO <sub>2</sub> e)	195	-30	165	84	165	N/A	N/A	N/A
Gross GHG emissions in Scope 2 as per the market-based method (tCO <sub>2</sub> e)	523	-19	504	96	504	N/A	N/A	N/A
<b>Significant GHG emissions in Scope 3</b>								
Total gross indirect GHG emissions as per the location-based method (Scope 3) (tCO <sub>2</sub> e)	9 690 613	-211 864	9 478 749	98	9 478 749	N/A	N/A	N/A
Total gross indirect GHG emissions as per the market-based method (Scope 3) (tCO <sub>2</sub> e)	11 240 509	-1 332 407	9 908 102	88	9 908 102	N/A	N/A	N/A
1. Purchased goods and services	N/A	N/A	N/A	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	N/A	N/A	N/A
2. Capital goods	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3. Fuel and energy-related activities as per the location-based method (not included in Scope 1 or Scope 2)	2 409 529	-331 296	2 078 233	86	2 078 233	N/A	N/A	N/A
3. Fuel and energy-related activities as per the market-based method (not included in Scope 1 or Scope 2)	3 959 424	-1 451 838	2 507 586	63	2 507 586	N/A	N/A	N/A
4. Upstream transportation and distribution	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
5. Waste generated within the scope of activities	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
6. Business trips	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
7. Commuting by employees	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
8. Upstream leased assets	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
9. Downstream transportation and distribution	N/A	N/A	N/A	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	N/A	N/A	N/A
11. Use of sold products	7 281 085	119 431	7 400 516	102	7 400 516	N/A	N/A	N/A
12. End-of-life treatment of sold products	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
13. Downstream leased assets	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
14. Franchising licenses	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
15. Investments	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>Total greenhouse gas emissions</b>								
Total GHG emissions (location-based) (tCO <sub>2</sub> e)	9 699 115	-211 078	9 488 037	98	9 488 037	N/A	N/A	N/A
Total GHG emissions (market-based) (tCO <sub>2</sub> e)	11 249 338	-1 331 608	9 917 729	88	9 917 729	N/A	N/A	N/A



Greenhouse gas emissions within the GHG Protocol take into account seven greenhouse gases – carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons<sup>18</sup> (HFC), perfluorocarbons (PFC), sulphur hexafluoride (SF<sub>6</sub>), and nitrogen trifluoride (NF<sub>3</sub>). Emissions of individual greenhouse gases can be expressed as CO<sub>2</sub> equivalents (hereinafter the “CO<sub>2</sub>e”). Global warming potential indicates to what extent greenhouse gases influence global warming over a certain period compared to CO<sub>2</sub>.

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 18.

Reported greenhouse gas emissions include those of SPP, SPP CZ and SPP CNG, i.e. companies under SPP’s operational control. The largest volume of greenhouse gas emissions related to SPP’s business comprises carbon dioxide, due to the combustion of natural gas that we supply to our customers.

Emissions of hydrofluorocarbons used in cooling equipment are recorded under fugitive emissions. In the case of 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.

<sup>18</sup> 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.

<sup>19</sup> WRI, WBCSD (2004), Greenhouse Gas Protocol Corporate Accounting and Reporting Standard.

**Table 18 – Source of emission factors for individual SPP emissions (Emission factors are given in units as stated in the sources)**

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:<sup>19</sup>

**Scope 1**

Direct emissions of SPP include emissions from own production of electricity, heat and cooling from stationary sources and fugitive emissions from air conditioning units. Emissions in Scope 1 also include vehicles used by SPP, SPP CZ and SPP CNG that are either owned by them or used based on leasing.

SPP CNG emissions also include fugitive methane emissions caused by the operation of CNG and LNG filling stations. These emissions emerge during metrological tests of CNG and LNG dispenser meters or during depressurisation of the dispenser filling nozzle.

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).

Fuel type	Unit	Emission factor 2025
Natural gas in SK	t CO <sub>2</sub> /TJ	56.20
Natural gas for CZ	t CO <sub>2</sub> /TJ	55.51
R410A air conditioning fluid	t CO <sub>2</sub> e/t	2 088
Electricity produced in SK (energy production mix)	g CO <sub>2</sub> /kWh	99.13
Electricity supplied in SK (residual supplier mix)	g CO <sub>2</sub> /kWh	334.33
Electricity produced in CZ (energy production mix)	g CO <sub>2</sub> /kWh	529.13
Electricity supplied in CZ (residual supplier mix)	g CO <sub>2</sub> /kWh	584.07
Electricity from solar power	g CO <sub>2</sub> /kWh	37
Electricity from nuclear power	g CO <sub>2</sub> /kWh	6.4
Diesel	g CO <sub>2</sub> /MJ	74.15
Petrol	g CO <sub>2</sub> /MJ	69.35
CNG	kg CO <sub>2</sub> e/kg	2.57546
LNG	kg CO <sub>2</sub> e/kg	2.60330
WTT electricity	kg CO <sub>2</sub> e/kWh	0.0185
WTT natural gas	kg CO <sub>2</sub> e/kWh	0.03347
Natural gas in SK		SPP-distribúcia
Natural gas for CZ		MoEn CZ
R410A air conditioning fluid		SZCHKT
Electricity produced in SK (energy production mix)		
Electricity supplied in SK		<a href="https://www.aib-net.org/facts/european-residual-mix/2024">https://www.aib-net.org/facts/european-residual-mix/2024</a>
Electricity produced in CZ (energy production mix)		
Electricity supplied in CZ		<a href="https://unece.org/sed/documents/2021/10/reports/life-cycle-assessment-electricity-generation-options">https://unece.org/sed/documents/2021/10/reports/life-cycle-assessment-electricity-generation-options</a>
Electricity from hydropower		
Electricity from nuclear power		
Diesel		MoEn SK
Petrol		MoEn SK
CNG		DEFRA 2025 Fuels, CNG
LNG		Fuels, LNG
WTT electricity		Transmission and distribution
WTT natural gas		WTT Fuels, natural gas



**Table 19 – SPP Group’s emissions in Scope 1 (t CO<sub>2</sub>e)**

		2025	2024
<b>Emissions from own sources</b>	SPP	7 968	7 185
	SPP CZ	0	0
	SPP CNG	540	548
<b>Vehicles</b>	SPP	482	439
	SPP CZ	69	58
	SPP CNG	31	34
<b>Fugitive emissions</b>	SPP	18	16
	SPP CZ	0	0
	SPP CNG	15	26
<b>TOTAL</b>	SPP	8 468	7 640
	SPP CZ	69	58
	SPP CNG	586	608

**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, as well as 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, as they take into account data on the quantity of electricity and gas supplied to customers from SPP’s internal databases.

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 trips – 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, while 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 shown 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 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 purposes, we also include information on greenhouse gas intensity 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 2025 as a key activity of the SPP Group.



**Table 20 – Greenhouse gas intensity**

SPP Group	Emissions related to internal consumption in tonnes of CO <sub>2</sub> e (Scope 1 and 2)	Total reported emissions in tonnes of CO <sub>2</sub> e (so-called CO <sub>2</sub> e equivalents)	Turnover (consolidated) in € million	Operating profit (consolidated) in € million	Amount of supplied energy in MWh (sum from Table 1)	Greenhouse gas intensity based on turnover (share of total emissions) in tonnes of CO <sub>2</sub> e/€	Greenhouse gas intensity based on operating profit (share of total emissions) in tonnes of CO <sub>2</sub> e/€	Greenhouse gas intensity based on supplied energy (share of total emissions) in tonnes of CO <sub>2</sub> e/€
<b>2025</b>	9 627	9 917 729	3 030	146	40 636 951	0.0033	0.0679	0.2441
<b>2024</b>	8 829	11 249 338	3 480	164	43 974 330	0.0032	0.0686	0.2558

Higher emissions in Scope 1 were caused by SPP's increased gas consumption (mainly due to weather and higher consumption for heating in winter and cooling in summer) and higher fuel consumption in transport due to the overall increase in the number of vehicles used by SPP and by the fact that the retired CNG vehicles had been replaced by vehicles using other propulsion systems (new passenger CNG vehicles are no longer being produced). The decrease in total emissions, as well as the lower emission intensity, were caused by a significant drop in supplied electricity reported in Scope 3, as SPP did not continue in 2025 with its activities as a so-called agent, under which it secured for other electricity suppliers in Slovakia the supply of electricity at preferential prices intended for household customers in 2023 and 2024.

**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 as part of decision-making in respect of achieving greenhouse gas emission reduction targets.



## 12.5. ESRS E5 Resource use and circular economy

**Identified risks and opportunities:**

**Identified risks and opportunities:**

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 in a rapidly changing market.

**Identified impacts:**

**Waste from internal operations – ANI**

Waste is a burden and, therefore, 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<sup>20</sup>) according to ISO 9001:2015 (Quality management system) and ISO 14001:2015 (Environmental management system), as well as Environmental Management and Audit Schemes (EMAS) that regulate 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. Given the above sources of waste generation, we do not keep records on waste related to SPP activities by specific business units.

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 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 latest 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, this 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. Concurrently, SPP has established a special website [odpadjesupa.sk](http://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 the law. 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 2025, approximately 50.1% of the total number of almost 1.5 million customers used electronic billing. Also, there were over 343 000 registered customers on the My SPP portal by the end of 2025 (compared to more than 255 000 as of 31 December 2024).

With the aim of securing material recovery, we arrange our 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 even cigarette butt filters.

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

In the reported period, the measures adopted in the field of resource use and circular economy did not require any additional financial costs or additional allocations of resources beyond standard operation.

<sup>20</sup> In addition to the above, IMS also includes ISO 45001:2018 and ISI/IEC 27001:2022.

**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 administration of gas and electricity supplies to customers (specifically, 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 the digitalisation of applicable processes (taking into account legislative settings).

**E5-5 Resource outflows**

SPP keeps detailed waste records in accordance with applicable legislation.

**Table 21 – Amount of waste by ESRS category**

	2025	2024
Total generated waste in tonnes	381.50	564.00
Hazardous waste disposed of in tonnes	26.90	100.21
Hazardous waste disposed of by recycling in tonnes	26.90	100.21
Non-hazardous waste diverted from disposal in tonnes	321.21	451.30
Non-hazardous waste disposed of by recycling in tonnes	321.21	451.30
Non-hazardous waste directed to disposal in tonnes	33.39	13.23
Non-hazardous waste directed to disposal by landfill in tonnes	33.39	13.23
Non-recycled waste in tonnes	33.40	13.23
Percentage of non-recycled waste	8.75	2.34
Total hazardous waste in tonnes	26.90	100.21
Hazardous waste disposed of by preparation for reuse	0	0
Hazardous waste disposed of as a result of other recovery operations	0	0
Non-hazardous waste disposed of for preparation for reuse	0	0
Non-hazardous waste disposed of as a result of other recovery operations	0	0
Hazardous waste directed to disposal	0	0
Hazardous waste directed to disposal by incineration	0	0
Hazardous waste directed to disposal by landfill	0	0
Hazardous waste directed to disposal by other disposal methods	0	0
Non-hazardous waste directed to disposal by incineration	0	0
Non-hazardous waste directed to disposal by other disposal methods	0	0
Total amount of radioactive waste	0	0

A more detailed breakdown of waste produced by SPP in 2025 by quantity and type is provided below:

**Table 22 – Amount and types of produced waste**

Waste diverted from landfill in tonnes (t)	At the workplace (t)		Outside the workplace (t)		Total (t)	
	2025	2024	2025	2024	2025	2024
Hazardous waste	26.895	100.209	0.00	0.00	26.895	100.21
Non-hazardous waste	165.099	245.84	156.110	205.47	321.209	451.30
<b>TOTAL</b>	191.994		156.110		348.104	551.51

Landfilled or incinerated waste in tonnes (t)	At the workplace		Outside the workplace		Total	
	2025	2024	2025	2024	2025	2024
Hazardous waste	0.005	0	0.00	0.00	0.005	0.00
Non-hazardous waste	8.35	5.59	25.040	7.64	33.390	13.23
<b>TOTAL</b>	8.355		25.040		33.395	13.23

Types of waste	Waste produced (t)		Waste diverted from landfill (t)		Landfilled or incinerated waste (t)	
	2025	2024	2025	2024	2025	2024
Construction and demolition waste (concrete, small construction debris, gypsum-based building materials, bitumen mixtures, metals, soils)	181.15	213.11	156.11	205.47	25.04	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)	25.623	92.405	17.27	86.82	8.35	5.59
Kitchen and other biodegradable waste, edible oils and fats	111.74	107.33	111.74	107.33	0.00	0.00
Other separate collection from operation of buildings (paper and cardboard, paper and cardboard packaging, plastic packaging, glass packaging)	37.635	50.313	37.64	50.31	0.00	0.00
Waste from operation and maintenance of technologies (oil filters, mineral oils, mixtures of fats and oils from oil-water separators)	25.351	101.591	25.34	101.59	0.01	0.00
<b>TOTAL</b>	381.499	564.75	348.10	551.52	33.40	13.23

In 2025, there was a drop in total waste generated by SPP due to a lower number of cleaned oil separators, which resulted in a smaller volume of hazardous waste. SPP also recorded a drop in waste from the disposal of discarded assets, the generation of construction waste, and paper and cardboard from the archive workplace.

The percentage of waste disposed of increased slightly in 2025 due to the reconstruction of sites owned by SPP, which generated excess soil and gravel aggregate. The volume of hazardous waste disposed of represented only 0.02% of the total amount of hazardous waste generated.

SPP makes sure that waste management is a controlled process based on waste legislation and environmental protection principles, while putting emphasis on sorting and maximum recovery. Employees are required to separate municipal waste into sorted waste (paper, plastic, glass), small electrical waste and batteries, as well as biodegradable waste into designated containers, while specialised external workers ensure weighing, recording, and disposal. Hazardous waste is handled according to hazardous waste identification sheets (HWIS), kept at designated and marked locations, and being hauled away exclusively by duly authorised contractual partners. SPP keeps electronic waste records in the Besoft system and reports data to the applicable authorities via the ISOH system.

## Social information

### 12.6. 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, but also 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 gives priority to ensuring 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 and maintaining a high level of corporate culture and shared values, constitute the 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, for instance, 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.

An important part of our core documentation is the SPP Code of Conduct, which 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 has force in both Slovakia and the Czech Republic, while taking into account 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 intermittent work, only if explicitly so stated 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 social, wage, and other entitlements of employees. The Collective Agreement establishes the benefits, payments, days off, etc., to which an SPP employee is entitled. 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.

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 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 preparing and monitoring 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 once every 2 to 3 years. Regular opinion surveys and the adoption of follow-up measures are key to achieving a more effective work environment with positive benefits for SPP as an employer.

SPP also has employee representatives appointed to the Supervisory Board, making up 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 fulfilling 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 to the support of diversity and inclusion and better sharing of information on measures and activities of individual organisational units implemented in the interest of fulfilling 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 the violation of ethical principles set out in the SPP Code of Conduct. More information on the process of reporting and handling complaints can be found in chapter ESRS G1, section 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, the vast majority of employees agreed that supporting diversity, equality and inclusion in SPP should be one of our areas of focus. 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 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 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 the Plan for Supporting Diversity and Inclusion in SPP, not only in internal processes (remuneration, education, benefits, etc.) and the work environment, but also in internal and external communication and projects implemented via 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 cultivates 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 personal 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 66% to 34%), 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 proportion of women in company management. There were no changes in 2025 compared to 2024 with respect to target values related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities.

**S1-6 Characteristics of the undertaking’s employees**

The number of persons employed in SPP, SPP CZ and SPP CNG reached 838 as of 31 December 2025. 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. At the same time, the information in

the Consolidated Financial Statements of SPP does not take into account persons employed in SPP CNG (13 in total), as SPP CNG is not fully consolidated.

In 2025, SPP employed 786 persons, of whom 521 were women and 265 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 since SPP does not employ more than 50 employees in any other geographical area.

There are a total of 679 permanent employees in SPP, of whom 238 are men and 441 are women. There are a total of 107 temporary employees in SPP, of whom 27 are men and 80 are women. In 2025, 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 2025. 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 deemed 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 23 – Total number of persons employed by different types of employment**

		2025	2024
<b>Men</b>	SPP	265	262
	SPP CZ	23	24
	SPP CNG	6	5
<b>Women</b>	SPP	521	486
	SPP CZ	18	13
	SPP CNG	5	5
<b>Other*</b>	SPP	0	0
	SPP CZ	0	0
	SPP CNG	0	0
<b>Undisclosed</b>	SPP	0	0
	SPP CZ	0	0
	SPP CNG	0	0
<b>TOTAL</b>	SPP	786	748
	SPP CZ	41	37
	SPP CNG	11	10

\* Gender as stated by employed persons themselves.

**Table 24 – Presentation of information on employed persons by type of contract broken down by region (number of persons or full-time equivalent)**

		2025	2024
<b>Number of employees (number of employees/full-time equivalent)</b>	SPP	786	748
	SPP CZ	41	37
	SPP CNG	11	10
<b>Number of permanent employees (number of employees/full-time equivalent)</b>	SPP	679	645
	SPP CZ	39	25
	SPP CNG	11	10
<b>Number of temporary employees (number of employees/full-time equivalent)</b>	SPP	107	103
	SPP CZ	9	12
	SPP CNG	0	0
<b>Number of employees with a non-guaranteed number of hours (number of employees/full-time equivalent)</b>	SPP	0	0
	SPP CZ	0	0
	SPP CNG	0	0
<b>Number of full-time employees (number of employees/full-time equivalent)</b>	SPP	784	747
	SPP CZ	39	35
	SPP CNG	11	10
<b>Number of part-time employees (number of employees/full-time equivalent)</b>	SPP	2	1
	SPP CZ	2	2
	SPP CNG	0	0

**Table 25 – Total number of persons employed by different types of employment broken down by gender**

		Men	Women	Other*	Undisclosed	TOTAL
<b>Number of employed persons/full-time equivalent</b>	SPP	265	521	0	0	786
	SPP CZ	23	18	0	0	41
	SPP CNG	6	5	0	0	11
<b>Number of permanently employed persons (number of persons/full-time equivalent)</b>	SPP	238	441	0	0	679
	SPP CZ	23	16	0	0	39
	SPP CNG	6	5	0	0	11
<b>Number of temporarily employed persons (number of persons/full-time equivalent)</b>	SPP	27	80	0	0	107
	SPP CZ	7	2	0	0	9
	SPP CNG	0	0	0	0	0
<b>Number of persons employed for a non-guaranteed number of hours (number of persons/full-time equivalent)</b>	SPP	0	0	0	0	0
	SPP CZ	0	0	0	0	0
	SPP CNG	0	0	0	0	0
<b>Number of full-time employed persons (number of persons/full-time equivalent)</b>	SPP	264	520	0	0	784
	SPP CZ	23	16	0	0	39
	SPP CNG	6	5	0	0	11
<b>Number of persons employed part-time (number of people/full-time equivalent)</b>	SPP	1	1	0	0	2
	SPP CZ	0	2	0	0	2
	SPP CNG	0	0	0	0	0

\* Gender as stated by employed persons themselves.

## Employee turnover

**Table 26 – Employee turnover**

		2025	2024
Total number of employment terminations	SPP	74	97
	SPP CZ	4	16
	SPP CNG	3	2
Total number of voluntary terminations by employees	SPP	58	45
	SPP CZ	3	2
	SPP CNG	3	1
Total number of involuntary terminations by employer	SPP	16	52
	SPP CZ	1	14
	SPP CNG	0	1
Overall turnover rate, including voluntary and involuntary terminations	SPP	9.63	12.95
	SPP CZ	10.30	
	SPP CNG		
Turnover rate with voluntary terminations	SPP	7.55	6.01
	SPP CZ	7.70	
	SPP CNG		

\* Gender as stated by employed persons themselves.

Turnover data were calculated as the proportion of employees who left the company to the total number of employees for the given year. Given the low number of employees in SPP CNG, turnover data are not presented in Table 26.

## S1-7 Characteristics of non-employees in the undertaking's own workforce

There were 24 persons employed in SPP who were non-employees at the end of 2025.

		2025	2024
Self-employed persons	SPP	0	0
	SPP CZ	0	0
	SPP CNG	0	0
People provided by a third party who are primarily engaged in employment activities	SPP	0	0
	SPP CZ	1	0
	SPP CNG	0	0
Other	SPP	24	20
	SPP CZ	0	9
	SPP CNG	0	0
Total	SPP	24	20
	SPP CZ	1	9
	SPP CNG	0	0

In 2025, these persons primarily performed intermittent, occasional administrative work based on an agreement on intermittent work. 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 agreements on intermittent work. As of 31 December 2025, SPP CNG did not employ any persons based on an agreement on intermittent work. 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 governed by the Collective Agreement (“CA”) that applies to 96.8% of persons employed in SPP, i.e. 760 persons (for comparison, 96.7% of persons employed in SPP in 2024). 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 law;
- Target bonus, Christmas bonus and work jubilee bonuses;
- Vacation and other days off beyond that required by law;
- Contribution for a preschool facility operated at the SPP site in Bratislava.

SPP has a new Collective Agreement concluded with the Gas Trade Unions for the 2025-2026 period. 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.

**Table 28: Collective bargaining coverage and social dialogue reporting**

Coverage rate	Coverage of employees by collective bargaining		Social dialogue with employees
	Employees – EEA	Employees – non-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%	96.8%		

SPP CZ and SPP CNG are not included in the table as they employ fewer than 50 persons.

**S1-9 Diversity metrics**

SPP has 4 employees at the highest management level, comprising no women and 4 men (for comparison, there were 5 employees in 2024, with no women and 5 men). The positions of CEO and division directors are considered top management.

**Table 29 – Age structure of persons employed as of 31 December**

		2025	2024
30 or younger	SPP	46	43
	SPP CZ	8	8
	SPP CNG	0	0
31 – 40	SPP	144	149
	SPP CZ	13	17
	SPP CNG	1	1
41 – 50	SPP	286	276
	SPP CZ	9	11
	SPP CNG	3	4
older than 50	SPP	310	280
	SPP CZ	11	1
	SPP CNG	7	5

The average age of persons employed in SPP as of 31 December 2025 was 46.7 years of age (for comparison, 46.33 years of age in 2024).

**Table 30 – Employee qualification structure as of 31 December**

		2025	2024
basic education	SPP	1	1
	SPP CZ	0	0
	SPP CNG	0	0
secondary vocational education	SPP	14	14
	SPP CZ	4	4
	SPP CNG	0	0
complete secondary education with leaving exam	SPP	299	279
	SPP CZ	16	16
	SPP CNG	5	5
university degree	SPP	472	454
	SPP CZ	21	17
	SPP CNG	6	5

**Table 31 – Structure of persons employed at individual management levels (%)**

Data in %		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	10	5	25	0
	SPP CNG	0	0	0	0	0	0	0	0	0	0
30 – 50	SPP	75	0	48	10	40	20	17	37	33	14
	SPP CZ	25	0	71.4	14.3	0	100	20	30	25	25
	SPP CNG	0	0	0	0	0	0	25	75	100	0
older than 50	SPP	25	0	29	14	23	18	10	29	43	10
	SPP CZ	75	0	0	0	0	0	5	30	25	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. These constitute an important tool for ensuring transparency, fairness, and the 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 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. a 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 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 fulfilling 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 ("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 2025, the fixed component multiple was set to 1.29. 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 fulfilling the post 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 2025, 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.

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 evaluating the 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 Marketing 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 2025, SPP employed a total of 37 persons with disabilities, of whom 11 were men and 26 were women. The above number represents 4.7% of SPP employees. At the end of 2025, SPP CZ did not employ any persons with disabilities. SPP CNG employed 1 person with a 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.

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.

**Table 32: Employed persons with disabilities in %**

Data in %		30 or younger	30 – 50	Older than 50
<b>Men</b>	<b>2025</b>	0.0	10.8	18.9
	<b>2024</b>	0.0	10.0	16.7
<b>Women</b>	<b>2025</b>	0.0	35.1	35.1
	<b>2024</b>	0.0	33.3	40.0

**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 2025, 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.

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 37 hours.

**Table 33: Average length of completed SPP training courses by management level in hours**

	Total average	Women	Men	Top management	Middle management	Lower management	Administration	Other positions
<b>2025</b>	37	39	32	8	35	47	37	12
<b>2024</b>	27	28	25	10	22	38	27	19

Training penetration (percentage of employees who participated in at least one optional training) reached 88.2% in 2025. Of this, the training penetration among men was at 82.5% and among women at 91.2%.

The average number of hours per SPP CZ employee was approximately 25 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.

Job performance evaluation of employees is done by setting individual and team targets, criteria and competencies of employees for the following evaluation period. Targets are set annually following the approval of the company’s business plan and are cascaded so that they support the targets of the company, divisions, and organisational units. The setting of targets takes place in the form of a conversation between the manager and the employee and all targets must be measurable, realistic, achievable, time-limited, and unambiguous. Target setting also includes development goals and educational activities, which are determined at the end of the previous year as a reference for the annual employee education plan. The evaluation of job performance and competencies of every employee takes place after the end of the evaluation period through regular feedback, the output of which is a job performance evaluation for the purpose of variable salary component payments.



**S1-14 Health and safety metrics**

The occupational health and safety management systems apply to all employees of SPP (100%) and SPP CNG (100%). SPP CZ does not have any occupational health and safety management system in place.

In addition to employee development and fair employee remuneration, 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 the 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, and covering 654 persons in Bratislava, 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, but considering the above, the number of occupational accidents is very low or zero.

In 2025, SPP recorded 1 registered work-related accident and did not record any cases of adverse work-related health conditions or any deaths due to adverse work-related health conditions associated with work performed by its own workforce or other workers of SPP. Both SPP CZ and SPP CNG did not record any registered work-related accident, any cases of adverse work-related health conditions or any deaths due to adverse work-related health conditions associated with work performed by their own workforce or other workers. In 2025, no extraordinary event was registered in SPP, SPP CZ, or SPP CNG at the workplaces or facilities of SPP that could endanger the life or health of any persons.

SPP did not record any cases of occupational diseases and recorded just 1 registered work accident that is subject to legal restrictions related to data collection. SPP CZ and SPP CNG did not record any cases of occupational diseases or registered work accidents that are subject to legal restrictions related to data collection.

SPP recorded 10.5 calendar days lost due to the work-related injury. SPP CZ or SPP CNG do not record 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 who meet the conditions for taking it.

In 2025, 33 women and 7 men were on maternity, parental, or paternity leave, of whom 5 women and 5 men applied for parental leave in the course of the year. The majority of employees return to work after their maternity, parental,

or paternity leave has ended – this applied to 8 women (100%) and 5 men (100%) in 2025.

Information provided in this disclosure requirement does not include SPP CZ or SPP CNG, as these were assessed as insignificant given the number of employees.

**S1-16 Remuneration metrics (pay gap and total compensation)**

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 in our workforce as of 31 December of the given year.

The average gross hourly wage of men is €16.60. The average gross hourly wage of women is €10.80. The percentage difference in remuneration between men and women is 35%. This difference is mainly due to the different nature of the positions held by men and women in SPP.

**Table 34 – 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
<b>2025</b>	0.65 : 1	1.06 : 1	0.95 : 1	0.98 : 1	0.94 : 1	1.01 : 1	1 : 1	1.02 : 1
<b>2024</b>	0.64 : 1	1.06 : 1	0.92 : 1	1 : 1	0.93 : 1	1.08 : 1	0.99 : 1	1 : 1

\*Ratio of base salary and bonuses between women and men in percentages, regardless of position



The ratio of total annual remuneration of the highest paid individual to the median total annual remuneration of all persons remunerated by SPP (including members of statutory bodies, but excluding the highest paid individual) was as follows in 2025:

**Table 35: Ratio between remuneration of the highest paid individual and median remuneration of remaining persons**

	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 of all persons remunerated by SPP
<b>2025</b>	7.42	0.66
<b>2024</b>	11.20	1.26

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 these were assessed as insignificant given the number of employees.



## 12.7. ESRS S4 Consumers and end-users

### Identified impacts:

#### Transparent communication – PPI

Transparency and clarity are crucial 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. There were no fundamental changes made to policies related to consumers or end users compared to 2024. It is the company's Board of Directors that is responsible for implementing policies related to section ESRS S4.

Internal policies regarding consumers and end users form part of the SPP Code of Conduct. An honest and fair relationship with customers while taking into account their needs and interests are prerequisites 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.

In its SPP Code of Conduct, SPP Code for Suppliers and related internal policies, SPP is committed to respecting the fundamental human rights of consumers, this in accordance with the UN Guiding Principles on Business and Human Rights (UNGP), the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises. These obligations are particularly relevant in the areas of customer protection, equal access to services, non-discrimination, protection of personal data and the right to transparent and fair conditions when concluding a contractual relationship.

Policies related to consumers and end users apply mainly to the downstream part of the value chain, i.e. to the supply of energy to end customers (households and retail segment). The policy covers the areas of customer communication, the provision of products and services, contractual terms and conditions, invoicing, handling of complaints and personal data protection. The policy does not have any separate provisions in the upstream part of the value chain (e.g. commodity purchasing, wholesale operations), as these activities do not directly affect consumers or end users.

The policies apply to SPP's activities in the territory of the Slovak Republic where the company provides services to end customers and where the relevant legislative and regulatory framework in the field of consumer protection applies. The policy does not contain specific exceptions for any specific customer group or geographic area within the Slovak Republic.

The company considers it a matter of course to consistently meet the reasonable expectations and requirements of customers, to take the initiative, and to assume personal responsibility. Customer relationships are based on discretion and courtesy without any favouritism or discrimination. SPP is committed to using only legitimate

### S1-17 Incidents, complaints and severe human rights impacts

During 2025, no serious human rights issues or incidents emerged in relation to our own workforce. SPP did not record any work incidents, incidents of discrimination, including harassment, complaints, or any serious impacts on human rights within its own workforce in 2025, as well as no associated significant fines, sanctions, or damages resulting from the aforementioned.

As part of the whistleblowing system, SPP handled 20 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 these were assessed as insignificant given the number of employees.

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 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 these were 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). Based on these surveys, SPP continued to achieve a high satisfaction score of more than 82 satisfaction points in CSI in 2025 (compared to 85 points in 2024).

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. In the field of customer care and availability, SPP continued to modernise SPP Customer Centres throughout Slovakia. The SPP Customer Centre in Banská Bystrica was moved to a shopping mall, greatly improving accessibility and customer comfort.

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 and even biometry. The My SPP portal enjoyed over 343 000 registered customers as of 31 December 2025 (compared to over 255 000 as of 31 December 2024).

SPP’s communication on social networks underwent changes as well. The company brings 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 these were assessed as insignificant.

**S4-3 Processes to remediate negative impacts and channels for consumers and end-users to raise concerns**

SPP regards the accessibility, early identification, and the fastest possible correction or elimination of negative impacts to be crucial 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 the 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 a specific meter, the billing of a provided service, the interruption or restriction of services, or other identified errors related to the service provision by SPP. SPP retains 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, in writing by post 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 by the legislative framework of the Slovak Republic. Pursuant to generally binding legal regulations regarding compliance with gas or electricity supply quality standards, and in the event of failing to comply with the 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 ESRS 2, section SBM-1 Strategy, business model and value chain. More information on the handling of complaints is provided in chapter 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 these were 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 minimising 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, where such 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 the 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 Regulation and Compliance 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.

E-learning training is conducted every one or three years, with the periodicity varying depending on the relevance of the agenda to personal data processing. New employees complete the aforementioned training upon hiring. 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 2025, SPP did not record any serious violations of the rules of personal data processing and protection or any serious incidents involving personal data protection violations, just like in 2024.

Another key area concerns preventing the legalisation of proceeds from criminal activities (anti-money laundering – AML), which is overseen by the competent person, and 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 record any serious cybersecurity incident in 2025, which was also the case 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 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 these were assessed as insignificant.

**S4-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities**

As for 2025, the target to achieve customer satisfaction in the households segment was set at the level of 79 points when measured by the Customer Satisfaction Index (CSI) on a sample of at least 1 000 customers. As concerns SPP’s company-wide targets, the actual value of the CSI index reached 82 points based on the evaluated survey results.

The customer satisfaction target is set on the basis of the annually conducted representative customer satisfaction survey, which represents a direct form of engaging consumers and end users in the target setting process. Customers provide feedback through structured questionnaires and their responses serve as inputs for the proposed CSI target value for the next period. The CSI is calculated using the results of a customer satisfaction survey, which we conduct regularly once a year on a representative sample of customers, measuring customer satisfaction in 6 areas: 1. Information awareness and communication, 2. Prices, 3. Invoicing, 4. Personnel, 5. Products and services, 6. Reliability of supply.

The results of the CSI survey represent the main tool for monitoring how the company is performing against the set target and when evaluating the company’s KPIs. Customers thus indirectly participate in the evaluation of the company’s performance by providing feedback in the individual measured areas. Their responses allow us to identify areas where expectations are being met, as well as areas where improvement is needed. The results of the survey are

presented annually to the company’s management and are used as a basis for making decisions about adjustments to internal processes, customer services, or communication activities. The main strengths and weaknesses of their SPP experience are regularly identified based on this customer feedback. These serve as a basis for proposing specific measures – for example, improving information awareness, adjusting processes, or strengthening customer service. The surveys and related improvements are reflected in the planning of activities for the subsequent year and directly influence CSI target updating. This process ensures that the targets set reflect the actual expectations and experiences of customers.

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 indicator 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 these were assessed as insignificant.

## Governance Information

### 12.8. 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.

**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.

**G1-1 Business conduct policies and corporate culture**

Responsible business is a prerequisite for our long-term success and also the trust in SPP by our customers. Even

so, 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,
- 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.

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.

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 holds 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.

At the same time, SPP adopted a separate SPP Code for Suppliers in the course of 2025. The SPP Code for Suppliers establishes required attitudes and standards of conduct for our contractual partners to promote the creation of a fair, transparent, and competitive environment, and the application of ethical principles. The SPP Code for Suppliers serves as guidance for our suppliers and their subcontractors to apply the same caring approach to their own business, activities and operations.

As part of standard planning processes, SPP regularly allocates adequate funds for measures related to business conduct and corporate culture policy in the annually compiled Business Plan. These measures did not 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 the 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 heavily 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).

**Table: Proportion of purchases from suppliers by location (excluding electricity, gas, and related services in %)**

	Domestic supplier	Foreign supplier
<b>2025</b>	93.59%	6.41%
<b>2024</b>	95.66%	4.34%

\* Supplier proportion data for 2024 was not subject to auditor's assurance in the annual report.

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 all key aspects of SPP's credibility towards business partners. For this reason, one of SPP's targets is to introduce and assess the sustainability standards within SPP's supply chain by the end of 2026 and, at the same time, to prioritise green procurement principles when procuring goods/ services/construction work in SPP.

The information provided in this disclosure requirement does not include SPP CZ or SPP CNG as these were assessed as insignificant.

**G1-3 Prevention and detection of corruption and bribery**

The SPP Code of Conduct lays down a clear commitment to zero tolerance of any form of corrupt behaviour and a commitment to avoid all activities that hint at 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's 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, the 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 resolve 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, as per 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 they join 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 the 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 2025, 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 20 complaints and queries in 2025, which related to other areas governed by the SPP Code of Conduct (compared to 13 in 2024). All employees, members of statutory and supervisory bodies, and the management are subject to equally strict requirements and rules concerning 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, he/she informs the CEO, the Board of Directors, or members of the statutory bodies of the company.

#### **G1-4 Confirmed incidents of corruption or bribery**

The SPP Code of Conduct establishes a clear commitment to zero tolerance of any form of corrupt behaviour and a commitment to avoid any and all activities that hint at any corruption. SPP employees fill out a conflict of interest statement 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 2025, 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 an 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 goodwill.

In 2025, 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 2025, SPP was a member of the following organisations:

- American Chamber of Commerce in the Slovak Republic
- CFO Club
- Circular Slovakia
- Energy Traders Europe
- Eurogas
- HRCOMM
- 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
- Association of Metallurgy, Mining Industry and Geology of the Slovak Republic, membership was established in the course of 2025.
- Union of Power Industry Employers of Slovakia, membership expired in the course of 2025.

The information provided in this disclosure requirement does not include SPP CZ or SPP CNG as these were 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.

**Table 36: Number of issued orders by due date**

Maturity period		2025	2024
<b>30 days</b>	no.	2 086	1 766
	%	64.72	59.40
<b>21 days</b>	no.	485	461
	%	15.05	15.51
<b>60 days</b>	no.	213	306
	%	6.61	10.29
<b>14 days</b>	no.	356	340
	%	11.05	11.44
<b>less than 10 days</b>	no.	83	100
	%	2.58	3.36

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 2026, SPP will continue to more thoroughly require its suppliers to submit invoices electronically in the form of e-invoices, instead of delivering paper invoices. In relation to new suppliers, sending and delivering solely

by e-invoices became the standard billing method in 2025 under the general business terms and conditions of SPP. 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 these were assessed as insignificant.

## 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
SPP plus	SPP plus 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

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 Hotline  
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 the 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 the website [www.spp.sk](http://www.spp.sk) 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.

# **ANNEX 1 – INDEPENDENT AUDITOR’S REPORT AND INDIVIDUAL FINANCIAL STATEMENTS FOR 2025**

**Slovenský plynárenský priemysel, a.s.**

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## 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 2025, 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 2025, 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 International Ethics Standards Board for Accountants' International Code of Ethics for Professional Accountants (including International Independence Standards) in the wording as adopted by the Slovak Chamber of Auditors (hereinafter the "Code of Ethics for Auditors"), including the ethical requirements 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"), as applicable to audits of financial statements in the Slovak Republic. We have also fulfilled our other ethical responsibilities in accordance with the Code of Ethics for Auditors and the ethical requirements under the Act on Statutory Audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

#### 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/about](http://www.deloitte.com/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 Act No. 431/2002 Coll. on Accounting, 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 audited 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.

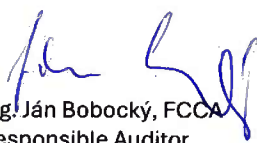
As at the issuance date of the auditor's report on the audit of separate financial statements, the annual report was not available to us.

When we obtain the annual report, we will assess whether the Company's annual report, excluding the requirements on sustainability reporting, 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 2025 is consistent with the separate financial statements for the relevant year; and
- The annual report, excluding the requirements on sustainability reporting, 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, 11 March 2026



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

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

# **ANNEX 2 – INDEPENDENT AUDITOR’S REPORT AND CONSOLIDATED FINANCIAL STATEMENTS FOR 2025**

**Slovenský plynárenský priemysel, a.s.**

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**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 2025, 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 2025, 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 International Ethics Standards Board for Accountants' International Code of Ethics for Professional Accountants (including International Independence Standards) in the wording as adopted by the Slovak Chamber of Auditors (hereinafter the "Code of Ethics for Auditors"), including the ethical requirements of Act No. 423/2015 Coll. on Statutory Audit and on Amendment to and Supplementations of Act No. 431/2002 Coll. on Accounting, as amended, as amended (hereinafter the "Act on Statutory Audit"), as applicable to audits of financial statements in the Slovak Republic. We have also fulfilled our other ethical responsibilities in accordance with the Code of Ethics for Auditors and the ethical requirements under the Act on Statutory Audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

**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/about](http://www.deloitte.com/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 Act No. 431/2002 Coll. on Accounting, 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 audited 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, excluding the requirements on sustainability reporting, 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 2025 is consistent with the consolidated financial statements for the relevant year; and
- The consolidated annual report, excluding the requirements on sustainability reporting, 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, 11 March 2026



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

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