



GPW GROUP CLIMATE POLICY

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2. Purpose and scope

- 2.1. The companies of the GPW Group (the "GPW Group" or the "Group") carry out their operations in compliance with the highest business, social, ethical and other environmental standards. The greatest challenges facing the world and the economy today include climate change and its consequences. The GPW Group integrates climate change and related risks into the processes of setting targets and monitoring the effects and results of its activities.
- 2.2. The purpose of this GPW Group Climate Policy (the "Policy") is to set out the main directions of the Group's efforts to prevent adverse climate change. The purpose of the Policy is also to define the approach to climate management in the GPW Group and the main responsibilities in this area at the level of the GPW Group.
- 2.3. The implementation of the Policy is aimed at taking actions necessary to reduce greenhouse gas emissions resulting from the activities of the GPW Group as well as at the development of good practices in this area.
- 2.4. This Policy has been adopted by the Management Board of all the GPW Group companies and provides guidelines for the activities of the entire Group.
- 2.5. Each Employee of the GPW Group Companies shall read and comply with this Policy.

3. Definitions and abbreviations

- 3.1. **GPW Group** – the Warsaw Stock Exchange Group. Pursuant to Article 3(1)(44) of the Accountancy Act, the Group is comprised of a parent entity (the Warsaw Stock Exchange) and subsidiaries.
- 3.2. **GPW, Exchange** – the Warsaw Stock Exchange.
- 3.3. **Circular economy** – an economic concept where products, materials and commodities should remain in the economy as long as possible and the generation of waste should be minimised as much as possible.
- 3.4. **Climate** – a set of atmospheric phenomena and processes (weather conditions) characteristic of a given area, formed under the influence of physical and geographical properties of the area, defined on the basis of results of long-term meteorological observations and measurements
- 3.5. **ESG Manager** – a person appointed by the GPW Management Board as responsible for co-ordinating ESG management in the GPW Group.
- 3.6. **Climate risk** – risks associated with the consequences of climate change, including the impact of extreme weather events leading for instance to infrastructure damage, disruption of energy supply, crop damage, disruption of supply chains (physical risk) and risks resulting from the need for the economy to adapt to gradual climate change, including the use of low-carbon solutions, the need to apply new technologies and to adapt to new regulations (transition risk).
- 3.7. **Company** – a company of the GPW Group.
- 3.8. **Sustainable Stock Exchanges Initiative (SSEI)** – a United Nations Partnership Programme initiated by the United Nations Conference on Trade and Development (UNCTAD), the UN Global Compact, the United Nations Environment Programme Finance Initiative (UNEP FI) and the international investor network Principles for Responsible Investment (UN PRI). SSEI's mission is to provide a global platform to explore how stock exchanges, in partnership with investors, companies (issuers), regulators, policymakers and relevant international organisations, can improve ESG (environmental, social and governance) performance and encourage sustainable investment, including financing for the 17 UN Sustainable Development Goals.
- 3.9. **UN Global Compact** – an initiative bringing together sustainable business, established in 2000 by the Secretary-General of the United Nations. UN Global Compact Network Poland

is the secretariat of the Polish UNGC members and an accelerator of local programmes and activities.

- 3.10. **Scope 1 greenhouse gas emissions** – direct emissions from sources owned or controlled by the organisation.
- 3.11. **Scope 2 greenhouse gas emissions** – indirect emissions, resulting from the consumption of imported (purchased or externally supplied) electricity, heat, process steam, cooling (in practice, greenhouse gas emissions arise at the place of production of those media).
- 3.12. **Scope 3 greenhouse gas emissions** – other indirect emissions generated along the value chain, for instance from the production of raw materials or intermediate products, waste management, transport of raw materials and products, business trips by employees or the use of products by end users.
- 3.13. **Climate change** – changes in the state and characteristics of the climate which persist over an extended period (a decade or more). This refers to any change in climate, whether due to natural variation or human activity.
- 3.14. **Sustainable development** – development which meets present needs without compromising the ability of future generations to meet their own needs. It aims to ensure that economic development takes place while protecting the environment, the health of which is the basis for the overarching objective of sustainable development, namely a good quality of life for people now and in the future.
- 3.15. **17 UN Sustainable Development Goals** – the directions for sustainable development set by the leaders of the United Nations member countries for the period 2015-2030 and presented in the document “2030 Agenda for Sustainable Development”. These directions reflect the three dimensions of sustainable development: economic, social and environmental.
- 3.16. **ESG Committee** – hereinafter referred to as “the Committee”, is a standing committee established by the GPW Group. The Committee is a body supporting the GPW Group Management Boards in exercising supervision over the ESG management system. Acting within its powers, the Committee monitors the effectiveness and adequacy of the ESG management system based on reports received. Representatives of the Group Companies appointed by the GPW Group Management Boards participate in the work of the Committee.

4. Principles for implementing the GPW Group Climate Policy

KEY DIRECTIONS

- 4.1. The GPW Group strives to reduce the level of greenhouse gas emissions from its activities, in particular by improving the management of environmental aspects such as the level and efficiency of energy and fuel consumption, waste management aiming at a circular economy, and increasing environmental awareness of stakeholders, in particular the GPW Group Employees.
- 4.2. The GPW Group acts as a promoter of good practices concerning the reduction of the negative impact of business activity on the Climate and transparent information on climate issues by GPW-listed companies.
- 4.3. The GPW Group is improving its monitoring of greenhouse gas emissions resulting from the activity of the GPW Group Companies and regularly publishes its emission data on an annual basis.

RESPONSIBLE CLIMATE CHANGE MANAGEMENT

- 4.4. The Companies of the GPW Group operate in compliance with applicable environmental, climate and nature conservation laws and take a responsible approach to managing the Climate impact of their business operations. The GPW Group’s approach to integrating climate issues into its operations is consistent with the principles set out in the “Code of Best Practice for GPW Listed Companies 2021”.
- 4.5. The GPW Group incorporates the principles of the UN Global Compact in its activities and declares that it will strive to:

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- a. a preventive approach to the environment,
 - b. take initiatives to promote environmentally responsible behaviour,
 - c. and, where possible, use and disseminate environmentally friendly technologies.
- 4.6. Furthermore, the GPW Group supports the Climate protection goals set by the Sustainable Stock Exchanges Initiative and the 17 Sustainable Development Goals set by the United Nations for the period 2015-2030. The implementation of the directions of action set out in this Policy is intended to make a positive contribution in particular to the UN Sustainable Development Goal 13: "Take urgent action to address climate change and its impacts".
 - 4.7. At the executive level, Climate change is a responsibility of and primarily reported by the ESG Manager to the Member of the GPW Management Board dedicated to ESG issues. Members of the Management Boards of the GPW Group Companies are actively involved in setting climate targets and monitoring progress, including through participation in the work of the ESG Committee.
 - 4.8. Climate change is addressed on a regular basis in the GPW Group by the ESG Committee, which comprises representatives of GPW Group Companies and GPW executives designated by the GPW Management Board. The ESG Committee is responsible for overseeing the implementation of ESG measures, including those related to Climate change, undertaken under this Policy; participates in the analysis of the relationship between climate and the GPW Group's business; and provides opinions on how Climate risks should be addressed. The ESG Committee is headed by an Exchange Management Board Member dedicated to ESG issues.
 - 4.9. The GPW Group's employees and their attitudes are an important factor for effective implementation of the Group's Climate Policy targets. They are, among other things, the conveyer of knowledge about the Group's Climate Policy; therefore, the GPW Group implements information and education measures aimed at raising environmental awareness (including the importance of Climate change) among the GPW Group's Employees.
 - 4.10. As part of the implementation of the ESG Strategy, the GPW Group defines and implements Annual Operating Plans which specify in greater detail the objectives and actions of the Companies in the area of ESG for a given year, including the objectives and actions related to Climate change. The Annual Operating Plans take into account the GPW Group's ESG Strategy and this Climate Policy and refer to both documents.
 - 4.11. The degree of implementation of the GPW Group's activities compliant with this Climate Policy as well as with the Climate Change targets included in the GPW Group's ESG Strategy is subject to annual evaluation coordinated by the ESG Manager. Conclusions of the evaluation contribute to the process of defining subsequent Annual Operating Plans.

CLIMATE RISK

- 4.12. Climate risk management is an integral part of the GPW Group's risk management system. The GPW Group Companies identify risks and opportunities related to climate change within the areas in which they manage financial and non-financial risks (compliance, operational, business and reputational risks).
- 4.13. As regards Climate Risk, the impact of the materialisation of the risk on the GPW Group Companies is assessed.
- 4.14. Corrective action plans for Climate Risk assessed as unacceptable are developed as an integral part of the risk management plan in the area concerned.
- 4.15. Based on the data collected by the owners of the areas where Climate Risk has been identified, an analysis of the risk is carried out.
- 4.16. The analysis is performed at least once a year, in each of the Companies comprising the GPW Group.
- 4.17. The conclusions of the analyses made are subject to opinion of the ESG Committee and presented to the Exchange Supervisory Board.

ENERGY EFFICIENCY

- 4.18. The GPW Group strives for high energy efficiency in every area of its activity. The GPW Group Companies declare their willingness to systematically identify areas to improve energy efficiency, reduce energy losses and minimise energy consumption in their operations. The energy efficiency measures will be accompanied by periodic energy audits of the GPW Group Companies' operations.
- 4.19. In implementing this Policy, the GPW Group focuses its efforts on reducing energy consumption by, among other things, using high-energy-rated equipment and solutions which reduce energy consumption and improve the energy efficiency of office lighting systems, including the use of LED lighting and a smart switch-off system.
- 4.20. The GPW Group sees renewable energy sources as a major opportunity for the implementation of sustainable energy management and is committed to increasing the share of energy consumption from renewable energy sources in its operations.

BUSINESS TRAVEL

- 4.21. The GPW Group sees a sustainable approach to business travel as one of the important elements in reducing the impact of its activities on Climate change. The GPW Group strives to reduce the environmental impact of business travel and, to this end, it rationalises and reduces unnecessary business travel through online meetings and teleconferencing.
- 4.22. The choice of means of transport for business travel by a GPW Group Employee should always take into account, among others, the climate criterion, i.e., the impact of the means of transport on the Climate and greenhouse gas emissions. The climate criterion is an important but not the only criterion for choosing the means of transport for business travel.
- 4.23. This means that while the GPW Group prefers to use rail transport, in justified cases involving the need to choose the fastest available means of transport, a GPW Group Employee is entitled to use air transport.
- 4.24. It is the GPW Group's objective to use company vehicles which incorporate technologies reducing their environmental impact. To this end, the GPW Group aims to increase the share of low-emission vehicles (with electric or hybrid propulsion) in the GPW Group's fleet of company vehicles in use.
- 4.25. At the same time, the GPW Group encourages its Employees to more frequently choose environmentally friendly means of transportation for their daily commuting, such as public transport and cycling. In principle, the GPW Group is a cyclist-friendly organisation, which means that it tries, in cooperation with the administrator of the GPW headquarters building, to implement solutions making it easier for GPW Group Employees to commute to work by bike.

NATURAL RESOURCES AND A CIRCULAR ECONOMY

- 4.26. The GPW Group follows a Circular economy approach. The objective of the GPW Group is to increase the share of recycling in the methods of disposal of waste resulting from the GPW Group's operations.
- 4.27. The GPW Group implements rational management of the consumption of natural resources and declares its intention to reduce the consumption of raw materials, including plastics and paper, and to manage other office resources economically.
- 4.28. The GPW Group strives to reduce greenhouse gas emissions through efficient management of energy suppliers and responsible waste management.

REPORTING AND COMMUNICATING PROGRESS IN IMPLEMENTING THE POLICY

- 4.29. The ESG Committee reports the degree of implementation of the Policy and the targets contained in the ESG Strategy to the GPW Management Board and the Management Boards of the other GPW Group Companies at least once a year.
- 4.30. The status of implementation of the Policy is publicly reported on an annual basis. Such information is available on the GPW website in the annual Integrated Reports of the GPW Group. The GPW Group reports on an annual basis, among others, Direct Emissions (Scope

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1), Indirect Emissions (Scope 2) and, where possible and reasonable, other indirect emissions (Scope 3).

4.31. Any questions about this Policy should be addressed to the GPW Administration Department.