

1. Information about the Company	
Company Name: Grupa Azoty S.A.	
Company Address: ul. Kwiatkowskiego 8, 33-101 Tarnów, Poland	
Country: Poland	
Town/Location: Tarnów	
Company authorised representative: Piotr Skóra I certify that the data contained in this report completely and accurately represents the Company's operations during the reporting period.	
Signature: Piotr Skóra Title: Director of the Financial Office - Treasurer Date: 30 April 2024	
Contact Details: Telephone: (+48) 14 637-48-52 Mobile: (+48) 785 780 952 Email: Piotr.skora@grupazoty.com	

Please provide key data on the Company performance, as well as production levels at each plant. For each of the 7 large plants please provide:

Item	Cumulative			
	[PLN '000]	2021	2022	2023
Revenue		2,573,341	3,960,797	2,313,522
Profit/(loss) on sales		115,236	158,529	(439,582)
EBIT		126,411	58,018	(450,005)
EBITDA *		276,184	288,825	(240,666)
Net profit/(loss)		191,790	356,060	(1 600,306)

* Following a revision of the Accounting Policy, changes were made in the reporting period to the presentation of EBITDA so as to exclude the effects of possible impairment losses on EBITDA. The comparative data was appropriately restated.

Key performance indicators in terms of energy consumption, emissions, use of natural resources, and carbon dioxide emissions;

See Section 4 and Section 5.

Number of staff employed and any change in employment over past 3 years

	As at 31 Dec 2021	As at 31 Dec 2022	As at 31 Dec 2023
Number of direct employees:	2,155	2,147	2,158
Number of contracted workers:	-	-	-

Provide information on permits and each subsidiary's compliance status with IPPC/IED (*Integrated Pollution Prevention and Control Directive/Industrial Emissions Directive*)

Currently, Grupa Azoty S.A. operates pursuant to the following decisions:

Integrated permits:

- Decision by the Marshal of the Kraków Province dated 20 June 2012 Ref. No. SR-II-1.7222.1.1.2012, granting an integrated (IPPC) permit to Zakłady Azotowe w Tarnowie-Mościcach for the Hydrogen Unit, valid for an indefinite term (permit amended by Decision of 3 December 2014 Ref. No. SR-II-1.7222.2.13.2014);
- Decision by the Governor of the Kraków Province dated 16 February 2007 Ref. No. ŚR.XIV.JI.6663-6-05, granting an integrated (IPPC) permit to Zakłady Azotowe w Tarnowie-Mościcach for the Park Infrastruktura Complex, valid for an indefinite term (permit amended by Decision dated 29 July 2011, Ref. No. SR-II-1.7222.1.3.2011; Decision dated 11 September 2012, Ref. No. SR-II-1.7222.1.7.2012; Decision dated 3 December 2014, Ref. No. SR-II-1.7222.2.17.2014; Decision dated 31 December 2015, Ref. No. SR-II-1.7222.2.1.2015; Decision dated 10 March 2017, Ref. No. SR-II.7222.2.9.2016; Decision dated 22 June 2020, Ref. No. SR-II.7222.2.4.2020; Decision dated 12 August 2020, Ref. No. SR-II.7222.2.28.2019; and Decision dated 22 June 2022, Ref. No. SR-II.7222.2.22.2021);
- Decision by the Governor of the Kraków Province dated 17 April 2007 Ref. No. ŚR.XI.JI.6663-3-06, granting an integrated (IPPC) permit to Zakłady Azotowe w Tarnowie - Mościcach for the POM Manufacturing and Compounding Complex, valid for an indefinite term (permit amended by Decision of 29 July 2011 Ref. No. SR-II-1.7222.1.1.2011 and Decision of 3 December 2014 Ref. No. SR-II-1.7222.2.14.2014);
- Decision by the Governor of the Kraków Province dated 29 July 2011 Ref. No. SW.II.1.AJ.7673-10/09, granting an integrated (IPPC) permit to Zakłady Azotowe w Tarnowie - Mościcach for the Technical Grade Nitric Acid Unit, Calcium Ammonium Nitrate and Ammonium Nitrate Unit, Nitrogen Fertilizer Granulation Unit, and Dolomite Milling Unit, valid for an indefinite term (permit amended by Decision of 3 December 2014 Ref. No. SR-II-1.7222.2.15.2014, Decision of 16 August 2016 Ref. No. SR-II.7222.2.8.2016, Decision of 21 July 2017 Ref. No. SR-II.7222.2.27.2016, Decision of 18 January 2018 Ref. No. SR-II.7222.2.34.2017); and [Decision of 7 December 2023 Ref. No. SR-II.7222.2.20.2021.AnJ](#);
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- Decision by the Governor of the Kraków Province dated 17 July 2007 Ref. No. ŚR.XIV.JI.6663-2-06, granting an integrated (IPPC) permit to Zakłady Azotowe w Tarnowie-Mościcach for the Caprolactam and Polyamide Manufacturing Complex (permit amended by Decision of 16 March 2009 Ref. No. SW.II.1.JI.7673-6/08, with respect to the Natural Polyamide Unit), amended in its entirety by Decision by the Marshal of the Kraków Province dated 1 December 2010 Ref. No. SW.II.1.AJ.7673-11/08 (permit amended by Decision of 29 July 2011 Ref. No. SR-II-1.7222.1.2.2011, Decision of 16 February 2012 Ref. No. SR-II-1.7222.1.2.2012, and Decision of 20 June 2012 Ref. No. SR-II-1.7222.1.5.2012), Decision of 21 October 2013 Ref. No. SR-II-1.7222.1.3.2013, Decision of 3 December 2014 Ref. No. SR-II-1.7222.2.16.2014, Decision of 23 January 2018 Ref. No. SR.II.7222.2.12.2017, Decision of 17 August 2020 Ref. No. SR-II.7222.1.28.2018.AJ, and Decision of 10 December 2020 Ref. No. SR-II.7222.2.24.2019.AJ, valid for an indefinite term;
- Decision by the Marshal of the Kraków Province dated 28 June 2018 Ref. No. SR-II.7222.13.4.2016, granting an integrated (IPPC) permit to Grupa Azoty S.A. for its Iron-Chromium Catalyst Plant II, valid for an indefinite term;
- Decision by the Marshal of the Kraków Province dated 6 June 2022 Ref. No. SR-II-1.7222.1.8.2021.AnJ, granting an integrated (IPPC) permit for a Humic Acid Plant, valid for an indefinite term;
- Decision by the Marshal of the Kraków Province dated 1 July 2015 Ref. No. SR-IV-1.7222.1.2015 MG, granting an integrated (IPPC) permit to Grupa Azoty S.A. for the Central Wastewater Treatment Plant, (amended by Decision of 20 April 2018 Ref. No. SR-II.7222.1.7.2018.MM, Decision of 24 June 2020 Ref. No. SR-II.7222.2.17.2019.WM, and [Decision of 12 April 2023 Ref. No. SR-II.7222.2.6.2022.WM](#)), valid for an indefinite term;

Air emissions

- Decision by the Governor of the Kraków Province dated 12 September 2022 Ref. No. SR-II.7221.1.3.2022.AnJ, granting a permit for the release of gases and particulate matter into the air for a concentrated nitric acid plant operating under the name Concentrated Acid Plant, valid

until 11 September 2032;

- Decision by the Governor of the Kraków Province dated 29 December 2014 Ref. No. SR-II-1.7221.2.2014, granting a permit for the release of gases and particulate matter into the air to Grupa Azoty S.A., valid until 28 December 2024;
- Notification of Grupa Azoty S.A.'s EC II CHP Plant Water Treatment Unit and Modified Plastics Facility to the Marshal of the Kraków Province dated 24 November 2014 Ref. No. TB/JK/1034/2014;

EU ETS

- Decision by the Marshal of the Kraków Province dated 28 April 2017 Ref. No. SR-II.7225.1.21.2016, granting permission to participate in the European Union Emissions Trading Scheme for the CHP plant located on the premises of Grupa Azoty S.A., including a Monitoring Plan, amended by Decision by the Marshal of the Kraków Province dated 16 September 2019 Ref. No. SR-II.7225.2.3.2019.AJ, including a Monitoring Plan; Decision by the Marshal of the Kraków Province dated 28 September 2020 Ref. No. SR-II.7225.2.9.2019.AJ, including a Monitoring Plan; Decision by the Marshal of the Kraków Province dated 23 July 2021 Ref. No. SR-II.7225.2.14.2020.OBG, including a Monitoring Plan and a Sampling Plan; Decision by the Marshal of the Kraków Province dated 22 March 2022 Ref. No. SR-II.7225.2.21.2021.OBG, including a Monitoring Plan, as well as [Decision by the Marshal of the Kraków Province dated 13 April 2023 Ref. No. SR-II.7225.2.4.2023.AnJ, including a Monitoring Plan, valid for an indefinite term;](#)
- Decision by the Marshal of the Kraków Province dated 2 April 2020 Ref. No. SR-II.7225.6.2.2019.AJ, approving the Monitoring Methodology Plan for the CHP plant, amended by Decision by the Marshal of the Kraków Province dated 22 June 2022 Ref. No. SR-II.7225.6.12.2021.AnJ, and [Decision by the Marshal of the Kraków Province dated 5 October 2023 Ref. No. SR-II.7225.6.3.2023.AnJ, including a Monitoring Methodology Plan;](#)
- Decision by the Marshal of the Kraków Province dated 24 November 2017 Ref. No. SR-II.7225.1.7.2016, granting permission to participate in the European Union Emissions Trading Scheme with respect to greenhouse gas emissions from the units manufacturing nitric acid, ammonia and bulk organic chemicals by way of cracking, reforming, oxidation or similar processes, with a daily production capacity of over 100 Mg, including a Monitoring Plan, amended by Decision by the Marshal of the Kraków Province dated 13 June 2019 Ref. No. SR-II.7225.3.12.2018.AJ, including a Monitoring Plan, and amended by Decision by the Marshal of the Kraków Province dated 18 January 2021 Ref. No. SR-II.7225.2.3.2020.AJ, including a Monitoring Plan, Decision by the Marshal of the Kraków Province dated 22 September 2021 Ref. No. SR-II.7225.2.7.2021.OBG, including a Monitoring Plan, and Decision by the Marshal of the Kraków Province dated 21 December 2021 Ref. No. SR-II.7225.2.11.2021.OBG, including a Monitoring Plan, valid for an indefinite term, and [Decision by the Marshal of the Kraków Province dated 21 April 2023 Ref. No. SR-II.7225.2.6.2022.OBG, valid for an indefinite period;](#)
- Decision by the Marshal of the Kraków Province dated 15 December 2021 Ref. No. SR-II.7225.6.9.2021.OBG, approving the Monitoring Methodology Plan for the Production Units (previous versions: SR-II.7225.6.4.2020.OG of 20 April 2021 approving the Monitoring Methodology Plan with annexes; SR-II.7225.6.3.2019.AJ of 2 April 2020 approving the Monitoring Methodology Plan).

Water and wastewater

- Decision by the Mayor of Tarnów dated 13 January 2003 Ref. No. WGK.B-III.6210/16/02/03, granting a permit for collective water supply and collective wastewater discharge, valid for an indefinite term;
- Decision by the Governor of the Kraków Province dated 30 December 2014 Ref. No. SR-IV-1.7322.1.28.2014.MG, granting a permit for special use of water - abstraction of groundwater from an intake point located in Tarnów-Mościce, valid until 31 December 2034;
- Decision by the Governor of the Kraków Province dated 29 December 2005 Ref. No. ŚR.XIV.MGą.6811-31-05, granting a permit for special use of water - abstraction of surface water from the Dunajec river, valid until 31 December 2025, amended by Decision Ref. No. KR.RUZ.4211.180.2018.IT dated 16 November 2018;

- [Decision by the Regional Water Management Authority of Kraków dated 6 July 2023 Ref. No. KR.RUZ.4210.148.2023AiM](#), granting a permit for discharge of wastewater containing substances particularly harmful to the water environment into the sewerage system of Zakład Oczyszczania Ścieków T.W. Sp. z o.o., valid until 6 July 2027;
- [Decision by the Regional Water Management Authority of Kraków dated 1 July 2019 Ref. No. KR.RUZ.421.1.102.2019.AS](#), granting a permit for discharge of wastewater containing substances particularly harmful to the water environment into the sewerage system of Zakład Oczyszczania Ścieków T.W. Sp. z o.o., valid until 1 July 2023;
- [Decision by the Regional Water Management Authority of Kraków dated 22 December 2021 Ref. No. KR.RUZ.4210.210.2021.AM](#), granting a permit for discharge of wastewater into surface waters, valid until 31 December 2025;
- [Decision Ref. No. SR-IV.1.7328.1.2013.MG](#), establishing a protected zone for water intake points; Waste
- [Decision by the Marshal of the Kraków Province dated 14 January 2022 Ref. No. SR-III.7244.1.41.2020.AG](#), permitting Grupa Azoty S.A. to collect waste, valid until 13 January 2032; Other
- [Resolution of the Provincial Assembly of the Kraków Province of 25 October 2010, No. LI/833/10](#), establishing Industrial Zone at ZAT S.A. (Official Journal of the Province of Kraków, No. 580/2010, item 4475).

Reporting period: [2023](#)

2. General information

Is the project materially compliant with all relevant EBRD Performance Requirements (taking account of agreed action plans, exemptions or derogations)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	If NO, please provide details of any material non-compliances:
Is the project materially compliant with all applicable environmental and social laws and regulations?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	If NO, please provide details of any material non-compliances:
Have there been any accidents or incidents that have caused damage to the environment, brought about injuries or fatalities, affected project labour or local communities, affected cultural property, or created liabilities for the company?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	If YES, please describe, including details of actions to remedy and prevent reoccurrence: In total, 14 accidents at work were reported. Each was investigated to determine its causes, and appropriate post-accident recommendations were issued.
Have there been any changes to environment, social, labour or health and safety laws or regulations that have materially affected the Company?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	If YES, please describe: The revised Industrial Accident Prevention Programme for Grupa Azoty S.A. presents a safety management system related directly to the classification of the Plant as an Upper-Tier Establishment, in accordance with the Polish Environmental Protection Law of 27 April 2001 (Dz.U. of 2021, 1973, as amended). The Industrial Accident Prevention Programme (of March 2022) effective at Grupa Azoty S.A. reflects the changes that took place within the establishment in relation to the IAPP adopted by means of an internal order of 2018 and recommendations following from the audit of the safety management system.
How many inspections did you receive from the environmental authorities	Number: 5	Inspection Report No. 2/2023: Inspection carried out

<p>during the reporting period?</p>	<p>on 18 January 2023 - 25 January 2023</p> <p>The inspection concerned completion of the ‘Alteration of the B-72 building under construction together with staff amenity space, construction of three tent halls and land development’ project.</p> <p><i>Requirement notices were issued obligating the inspected party to notify the Provincial Inspectorate for Environmental Protection (WIOŚ) how the recommendations contained in the Safety Report - Process Hazard Analysis - Fertilizers Storage and Packing Division were implemented for industrial accident scenarios for which the TNA (tolerated - not acceptable) and TA (tolerated - acceptable) risk levels had been obtained - implemented.</i></p> <p>WIOŚ was notified of their implementation by letter Ref. No. NS/NBP/2023/2/9/11 of 9 February 2023 and by letter Ref. No. NS/NBP/2023/2/21/1 of 21 February 2023.</p> <p>Inspection Report No. 87/2023: Inspection carried out on 9 May 2023 - 7 June 2023</p> <p>The inspection concerned notification by Grupa Azoty S.A. of the completion of test runs and commissioning of oleum storage tank IV.</p> <p><i>No requirement notices were issued.</i></p> <p>Inspection Report No. 104/2023: Inspection carried out on 12 May 2023 - 24 May 2023</p> <p>The inspection covered an examination of a notification from a natural person about environmental nuisance caused by excessive noise emissions to the environment due to the discharge of steam from the Natural Gas Conversion Unit V pipeline.</p> <p><i>No requirement notices were issued.</i></p> <p>Inspection Report No. 225/2023: Inspection carried out on 11 October 2023 - 6 November 2023</p> <p>The inspection concerned a report by GA S.A.’s dispatcher on ammonia water leakage from a flanged pipeline connection and oleum leakage onto a production tray as a result of a flanged connection coming unsealed. Commissioning of a soda lye storage tank.</p> <p><i>A requirement notice was issued obligating the inspected party to notify the Provincial Inspectorate for Environmental Protection (WIOŚ) of measures taken to prevent the reoccurrence of the industrial accident - ammonia water and oleum leakage -</i></p>
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		<p><i>implemented.</i></p> <p>WIOŚ was notified of their implementation by letter Ref No. NS/NBP/2023/11/23/5 of 23 November 2023.</p> <p>Inspection Report No. 237/2023: Inspection carried out on 29 November 2023 - 15 January 2024</p> <p>The inspection concerned the Humic Acid Unit - it covered compliance with the obligations under the integrated (IPPC) permit, prevention of major industrial accidents and the ECII CHP plant with respect to the sulfur content in heavy fuel oil combusted at the plant.</p> <p><i>A requirement notice was issued obligating the inspected party to immediately notify the Kraków Provincial Inspectorate for Environmental Protection in the event of a major industrial accident - implemented.</i></p> <p>WIOŚ was notified of its implementation by letter Ref. No. NS/NBP/2024/131/1 of 31 January 2024.</p>
<p>How many inspections did you receive from the health and safety authorities during the reporting period?</p>	<p>Number: County Sanitary Inspector - 9 State Fire Service - 2 National Labour Inspectorate - 1</p>	<p>Please provide details of such inspections, including the number and nature of any violations found:</p> <p>In 2023, the State Sanitary Inspectorate carried out 17 inspections, ending in post-inspection reports; of which 14 covered three issues:</p> <ul style="list-style-type: none"> • occupational health conditions, • compliance with regulations applicable to hazardous substances and mixtures, • assessment of the sanitary and technical condition of the facilities. <p>One inspection concerned hazardous substances. Two inspections were follow-up checks of the implementation of earlier decisions.</p> <p>Following the inspections, one decision was issued to remedy the identified failings (need to paint walls and ceilings in men's locker room on the ground floor of building C-24).</p> <p>All decisions with deadlines falling in 2023 were duly implemented.</p> <p>In 2023, the Provincial Headquarters of the State Fire Service in Kraków and the Municipal Headquarters of the State Fire Service in Tarnów carried out two inspections.</p> <p>Inspection carried out on 24 October 2023 - 17 November 2023</p> <p>1. MZ.52821.3.2023.4.MK The inspection covered compliance with the safety</p>

		<p>requirements applicable to a lower-tier establishment or upper-tier establishment. The inspection and examination activities were carried out at the cyclohexanone unit (KPC Division) No requirement notices were issued.</p> <p>2. MZ.52821.3.2023.5.MK The inspection covered compliance with fire safety regulations, feasibility of and conditions for emergency operations by fire protection units, handling of controlled substances, new substances and fluorinated greenhouse gases. The inspection and examination activities were carried out at the cyclohexanone unit (KPC Division) No requirement notices were issued.</p> <p>Inspection carried out on 21 March 2023 - 27 February 2023.</p> <p>The inspection covered compliance with the safety requirements applicable to a lower-tier establishment or upper-tier establishment. The inspection and examination activities focused on the Process Hazard Analysis for the Fertilizers Storage and Packing Division, which had been submitted for approval, and on compliance with the safety requirements specified in that document. No requirement notices were issued.</p>
How many inspections did you receive from the labour authorities during the reporting period?	Number: 1	<p>Please provide details of such inspections, including the number and nature of any violations found:</p> <p>In 2023, there was one inspection by the National Labour Inspectorate. Inspection No. 3/6 of 6 June 2023 - the Inspection Report and recommendations available at the Corporate Organisation and Human Capital Department.</p>
Have these visits resulted in any penalties, fines and/or corrective action plans?	Yes [] No [X]	If YES, please describe, including status of implementing corrective actions to address any violations found:
Has the Company engaged any contractors for project-related work in the reporting period?	Yes [X] No []	<p>If YES, please state for which types of work and how the Company monitored contractors' compliance with the EBRD Performance Requirements and the Environmental and Social Action Plan: The Company engages contractors to perform repair, maintenance, and capital works.</p> <p>A special procedure governs the performance of such work, including relevant permits. OHS inspections at construction sites are carried out on an ongoing basis.</p>

Were any of the violations stated above the responsibility of contractors?	Yes [X] No []	If YES, please provide details, including how the Company is ensuring that corrective actions are implemented by the contractor? A few violations of safety rules and procedures were identified, consisting mainly in incorrect work routines, poor scaffolding, absence of safety devices or failure to use personal protective equipment (hard hats, gas masks). On several occasions, work was halted until the violations were removed.
Have any operations been reduced, temporarily suspended or closed down due to environmental, health, safety or labour reasons?	Yes [X] No []	If YES, please describe: Construction work was suspended for a short time, pending removal of violations, without significantly affecting the progress of work.
<p>Please describe any environment or social programmes, initiatives or sub-projects undertaken during the reporting period to improve the Company's environmental or social performance and/or management systems:</p> <p>Implementation of projects related to climate and energy transition, GHG reduction and environmental impact of operations, as well as reduction of energy and raw materials consumption in production processes, was a vital part of Grupa Azoty S.A.'s investment activities in 2023. Key projects in these areas included the construction of a neutralisation and precipitation unit and the neutralisation unit (for ammonium nitrate), aimed to further reduce heat consumption in caprolactam and nitrate fertilizer production processes by maximising the use of heat of reaction, and to reduce the environmental impact of production activities.</p> <p>As part of initiatives aimed at minimising energy consumption and reducing the environmental impact of operations, the following two projects were completed and commissioned: upgrade of the heating water mains and construction of a unit for drying sludge from the wastewater treatment facility.</p> <p>Please indicate the level of associated expenditure (capital expenditure and operating expenditure), and whether this relates to the requirements of the Environmental and Social Action Plan, or to any other initiative:</p> <p>The expenditure incurred by Grupa Azoty S.A. in 2023 on its environmental projects was PLN 32,883 thousand.</p>		

3. Status of the Environmental and Social Action Plan

Please provide information on the status of each item in the Environmental and Social Action Plan (ESAP) agreed with EBRD. If the ESAP was updated during the reporting period, please attach a copy of the new plan.

See attachments for information on the implementation of ESAP.

4. Environmental Monitoring Data for each of the key subsidiaries

The information required in this section can be extracted from a CSR report, or a full CSR report can be attached.

Please provide the name and contact details for your environmental manager:			Krzysztof Chmura, Telephone: (+48) 14 637-36-67	
Parameter ²	Amount ³	Unit	Compliance Status ⁴	Comments ⁵
Wastewater				
Total wastewater	4,372	'000 m ³	Compliant	
Biochemical Oxygen Demand (BOD5)	8,772	kg	Compliant	

Chemical Oxygen Demand (COD)	40,612	kg	Compliant		
Suspended solids	27,993	kg	Compliant		
Phosphorus	230	kg	Compliant		
Nitrates	60,479	kg	Compliant		
Heavy metals	5	kg	Compliant		
[Other]					
Air emissions	Per each major point source	Mg/2023			
SO ₂	CHP Plant: NE/EPK/2	27	Compliant		
	NE/EPK/3	104			
	NE/EPK/1	4			
	Sulfuric Acid Plant NK/KPH/175	97			
	Hydroxylamine sulfate NK/KPH/185	42			
Nitrogen oxides (NO _x) in NO ₂ equivalent	CHP Plant: NE/EPK/1	2	Compliant		
	NE/EPK/2	8			
	NE/EPK/3	215			
	NE/EPK/4	18			
		Dual pressure nitric acid NA/PN-1/20	170		
		Synthesis Gas Unit NA/PN-2/77	150		
		Hydroxylamine sulfate NK/KPH/185	414		
		Ammonium nitrite NK/KPH/163	381	Non-compliant	
	NK/KPH/164	270			
	NK/KPH/165	452			
	NK/KPH/169	1,637			
Particulates	CHP Plant: NE/EPK/2	2	Compliant		
	NE/EPK/3	3			
	Fertilizers				
	NA/PN-3/48	19			
	NA/PN-3/47	25			
	NA/PN-3/50	3			
	NA/PN-3/51	7			
	NA/PN-3/105	14			
	NA/PN-3/106	8			
NA/PN-3/107	2				
	NA/PN-3/140	16			
	NA/PN-3/141	16			

	NA/PN-3/29-37	14		
	NA/PN-3/38-46	15		
CO ₂	CHP Plant	394,085	Compliant	
	Production units in ETS	437,741		
	Production units outside ETS	30,282		
Other parameters				
Noise emissions	45 - night 55 - day	dB	Non-compliant	As the Company was found to exceed the permitted night-time noise emission limits, since 2022 it has been subject to a continuous penalty imposed by the Provincial Inspector for Environmental Protection. The Company is taking operational and investment measures to reduce noise emissions.
[Other]				
Total waste including:		39,760.83		
10 01 15	Bottom ash and slag	16,847.18	Compliant	Recovery
10 01 02	Fly ash	18,849.06	Compliant	Recovery
17 04 05	Iron and steel	2,891.74	Compliant	Recovery
15 01 10*	Packaging containing hazardous substances	22.08	Compliant	Disposal
16 05 06*	Waste inorganic chemicals containing hazardous substances	0.22	Compliant	Disposal
16 08 02*	Spent catalysts	29.9	Compliant	Recovery
19 08 14	Sludge from non-biological treatment of wastewater	375.18	Compliant	Recovery

19 08 12	Sludge from biological treatment of wastewater	280.84	Compliant	Recovery
07 02 13	Waste plastic	73.56	Compliant	Recovery
17 02 01	Wood	1.31		Recovery
15 01 03	Wooden packaging	181.6	Compliant	Recovery
15 01 02	Plastic packaging	107.04	Compliant	Recovery

Please provide details of the types and amounts of solid wastes generated by the project. Indicate where wastes are classified as hazardous. Indicate the final re-use, recycle or disposal method for each waste type.

5. Resource Usage and Product Output

Parameter	Amount	Measurement Unit	Comments ⁶
Fuels used			
Liquid fuels	347	Mg	Consumption at EC II CHP plant + Sulfuric Acid Division (light fuel oil)
Gas fuels	19,761,525	m ³	Methane consumption by EC II CHP plant
Crude oil	0		
Natural gas	242,882,119	m ³	Total consumption by GA S.A.
Hard coal	170,136	Mg	
Lignite	0		
Electricity	398,274	MWh	Consumption by GA S.A. excluding captive consumption by EC II CHP plant (EC II captive consumption: 49,860 MWh).
Heat purchased from external sources	0		
Feedstocks and raw materials used			
Ammonia	62,830	Mg	
Dolomite	39,223	Mg	
Benzene	0	Mg	
Phenol	68,778	Mg	
Technical-grade methanol	0	Mg	
Liquid sulfur	104,728	Mg	
Product output			
Caprolactam	83,298	Mg	
Polyamide	75,233	Mg	
Ammonia	198,585	Mg	
Technical-grade nitric acid	319,119	Mg	
Total fertilizers	535,990	Mg	

6. Human Resources management			
Please provide the name and contact details for your Human Resources manager:		Krzysztof Pabian +48 14 637 3131	
	Total	Recruited in this reporting period	Terminated in this reporting period
Number of direct employees:	2,151	133	122
Number of contracted workers:	-	-	-
Were there any collective redundancies during the reporting period?	Yes [] No [X]	If YES, please describe the redundancy plan, including reasons for redundancies, number of workers involved, how they were selected, consultation undertaken, and measures to mitigate the effects of redundancy:	
Are any redundancies to the workforce planned for the next year?	Yes [] No [X]	If YES, please describe the redundancy plan, including reasons for redundancies, number of workers involved, and selection and consultation process:	
Were there any changes in trade union representation at Company plants during the reporting period?	Yes [X] No []	If YES, please provide details, and summarise engagement with trade unions during the reporting period: <ul style="list-style-type: none"> • There were changes in trade union representation at two trade unions. • One trade union already present at another company extended its coverage to include GA S.A. • In addition, a new trade union was established. 	
Were there any other worker representatives (e.g. in the absence of a trade union)?	Yes [] No [X]	If YES, please provide details and summarise engagement with them during the reporting period:	
Were there any changes in the status of Collective Agreements?	Yes [] No [X]	If YES, please provide details:	
Have employees raised any grievances with the project during the reporting period?	Yes [] No [X]	If YES, please state how many, split by gender, summarise the issues raised in grievances by male and female staff and explain how the Company has addressed them:	
Have employees raised any complaints about harassment or bullying during the reporting period?	Yes [] No [X]	If YES, please state how many, split by gender, summarise the issues raised by male and female staff and explain how the Company has addressed them:	
Have there been any strikes or other collective disputes related to labour and working conditions at the Company in the reporting period?	Yes [] No [X]	If YES, please summarise nature of, and reasons for, the disputes and explain how they were resolved:	

<p>Have there been any court cases related to labour issues during the reporting period?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>If YES, please summarise the issues contested and outcome:</p> <p>In 2023, there were 40 court cases related to labour law issues instigated by:</p> <ol style="list-style-type: none"> 1) 36 similar claims for overtime payment. The court proceedings were discontinued after the disputes had been settled out of court; 2) 1 court action seeking the declaration of an employment contract termination notice as ineffective, reinstatement following expiry of the notice period or, alternatively, award of compensation for the notice period. The dispute was settled out of court; 3) 1 court action seeking the declaration of an employment contract termination notice as ineffective, as well as reinstatement and payment of compensation for the period of remaining out of employment. The dispute was settled out of court; 4) 1 claim for compensation. The dispute was settled out of court; 5) 4 employee claims (combined into one under the same court docket number) for damages in connection with breach of the prohibition on discriminatory practices in employment. The case is pending.
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<p>Have there been any changes to the following policies or terms and conditions during the reporting period in any of the following areas:</p> <ul style="list-style-type: none"> - Trade union recognition - Collective Agreements - Non-discrimination and equal opportunities for all - Equal pay for equal work - Gender equality - Bullying and harassment, including sexual harassment - Employment of young workers under 18 - Wages and salaries (for regular and overtime hours) - Overtime - Working hours - Flexible working / work-life balance - Grievance mechanism for workers - Health & safety 	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>If YES, please give details, including of any new initiatives:</p> <ul style="list-style-type: none"> • General increases of base wages and salaries were introduced across the Company. • The Work Rules were revised by introducing/including relevant provisions to govern: flexible working time arrangements, equivalent working time, remote work.
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7. Occupational Health and Safety Data					
Please provide the name and contact details for your Health and Safety manager:		Andrzej Grobecki (+48) 14 637 4081			
	Direct employees	Contracted workers		Direct employees	Contracted workers
Number of man-hours worked in this reporting period:	3,416,061	-	Number of fatalities ⁷ :	0	-
Budget spent on OHS in this period (total amount and currency):	PLN 4,467,041.34		Number of disabling injuries:	0	-
OHS training provided in this period in person-days:	350 training sessions - 4,177 person-days	-	Number of Lost Time Incidents (including vehicular):	14	-
Number of lost workdays resulting from incidents:	533	-	Number of cases of occupational disease:	0	-

Number of sick days:	30,563	-			
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Causes of accidents at work (inattention, poor concentration, lack of clear guidelines on how to perform work / bad organisation of work, technical issues).

Accidents at work:
 - 6 accidents occurring during movement (most common ones),
 - 3 accidents resulting in chemical burns,
 - 4 accidents due to mechanical injuries,
 - 1 accident due to fainting.
 There were no fatal or severe accidents.
 The accident causes included predominantly inattention and lack of care (31%), followed by tripping or slipping (17%), inexperience and disregard of hazards (14%).

Please provide details of any fatalities or major accidents that have not previously been reported to EBRD, including total compensation paid due to occupational injury or illness (amount and currency):
 There were no such accidents.

Please summarise any emergency prevention and response training that has been provided for Company personnel during the reporting period:

Grupa Azoty S.A. employees receive emergency prevention and response training as part of periodic OHS training.
 The Company Fire Brigade also runs emergency prevention and response training as part of employee induction and periodic training programmes, as well as drills under the Internal Emergency Plan.

Please summarise any emergency response exercises or drills that have been carried out during the reporting period:

1. On-site drills to test the procedures of the Internal Emergency Plan for Grupa Azoty S.A.

Year	On-site drills to test the procedures of the Internal Emergency Plan		On-site drills at facilities classified as ZL (posing hazards to humans)	
	Planned	Completed	Planned	Completed
2019	26	26	0	0
2020	28	15	9	0
2021	25	20	9	10
2022	24	23 (+1 repeated drill)	0	0
2023	24	22+2 (in place of scheduled ones)	10	10

- The purpose of on-site drills is to:
- practice the action to be taken by Division employees during fires or chemical accidents in the context of following the applicable procedures, alerting services, initiating rescue operations,
 - practice the organisation and direction of rescue operations until the GA S.A. Company Fire Brigade arrives and the EOL takes command,
 - practice the procedures for cooperation between Divisional Management (DM), the Emergency Operations Leader (EOL) and the GA S.A. Company Fire Brigade during fires and emergencies,
 - enable the GA S.A. Company Fire Brigade to practice the tactics of emergency operations and the PA Company Fire Brigade to receive a report, deploy resources, alert services and follow internal procedures in accordance with the Internal Emergency Plan,
 - practice cooperation between the Company Fire Brigade and rescuers during emergency

operations,

- use alert and warning systems (manual fire switch, company phone, alarm siren) in practice and check if they are in good working order.

According to the Regulation of the Minister of Internal Affairs and Administration of 7 June 2010 on fire protection of buildings, other structures and areas, an owner or manager of a facility intended for more than 50 permanent users and not classified as hazard to human life category ZL IV should perform a practical check of the organisation and conditions of evacuation from the entire facility at least once every two years. In 2023, ten drills of this kind were scheduled for facilities which met the above criteria, and ten drills were carried out at such facilities owned by Grupa Azoty S.A. We intend to conduct such drills also in 2024.

Drills to test in practice the external and internal emergency plans with the participation of the Municipal and Provincial Headquarters of the State Fire Service have been scheduled for October 2024. This will fulfil the requirement laid down in the Environmental Protection Law of 27 April 2001, as amended: *Art. 261.3 The operator of an upper-tier establishment is required to review and organise drills of the internal emergency plan at least once every three years in order to update the plan and introduce any necessary changes.*

8. Stakeholder Engagement

Please provide the name and contact details for your external relations or community engagement manager:

Łukasz Bloch
Head of Corporate Communication and Marketing Department
email: lukasz.bloch@grupaazoty.com

acting Head Łukasz Rozborski
email: Lukasz.Rozborski@grupaazoty.com

Please provide information on the implementation of the Stakeholder Engagement Plan agreed with EBRD and summarise interaction with stakeholders during the reporting period, including:

- meetings or other initiatives to engage with members of the public or public organisations during the reporting period
- information on environmental protection, social policy and safety matters provided to the local community and other stakeholders during the reporting period:
- coverage in the media:
- interaction with any environmental or other community groups.

Please describe any changes to the Stakeholder Engagement Plan (SEP) agreed with EBRD:

Grupa Azoty maintains ongoing contact with the local community, keeping it informed of current developments in its operations. Grupa Azoty communicates with its stakeholders in various ways, including:

- In order to implement the Grupa Azoty Group Strategy for 2021-2030 and meet the requirements of the environmental management system, an 'Information brochure for residents of Tarnów and the surrounding communities' was prepared;
- Pursuant to Art. 261.5.1 of the Environmental Protection Law of 27 April 2001 (consolidated text: Dz.U. of 2020, item 1219, as amended), the Grupa Azoty S.A. Safety Guide was developed, approved by the Provincial Headquarters of the State Fire Service in Kraków, and made available to organisational units of the education and social assistance systems, medical operators, and other entities and institutions providing services to society, which may potentially be affected by accidents occurring at Grupa Azoty S.A.;
- Press briefings and/or press releases and/or study visits by journalists at major project sites

of Grupa Azoty S.A. These measures are intended to maximise the Group's media coverage, keeping the target audience (including local communities, customers, prospective customers, shareholders and investors) up to date with Grupa Azoty S.A.'s activities (through countrywide, local and trade media and through the official social media channels of the Grupa Azoty Group);

- Also, through additional publications commissioned as sponsored articles, the Company informed the public of important matters/projects related to: investment in its key business areas, including Polimery Police, its flagship business growth project, as well as research, development and innovation activities, including in new business segments;
- [Representatives of the Company participated as panellists in numerous debates and symposia, including Congress 590, the Krynica Forum, and the Economic Forum in Karpacz;](#)
- Running an intranet site and the grupaazoty.com website. The website content includes all material information on Grupa Azoty, its product portfolio, management systems etc. The intranet site is continually adapted to meet employee needs, with new sections added.
- Publication of the corporate Grupa Azoty Magazine, covering topics such as: information on and interviews concerning Grupa Azoty; information and interviews related to the CSR policy; culture; sports; employee-related and other matters. The magazine is addressed to both Grupa Azoty's and the Group's employees and external institutions. It is distributed mainly within the Group, but is also sent out to partner institutions, Members of Parliament from the Tarnów region, representatives of the city and county authorities, and retired employees. 12 issues were published in 2023, and the magazine is also available online;
- Internal broadcasting system, airing programmes three times a day on each business day (Monday through Friday) at the following times: 6.45-7.30 am; 10.00-10.15 am; 02.45-03.10 pm. The broadcasts cover the most important information on Grupa Azoty and its environment. In 2023, the system aired the Company's programmes and announcements, as well as trade union and employee announcements, including job openings. Initiatives organised by Grupa Azoty in support of special care centres, environmental protection, local communities (through education, culture or sports), local development and safety issues, were also discussed.

Grupa Azoty is a co-organiser and/or partner of conferences on environmental protection and safety. In 2023, it was involved, among other events, in the organisation of the 'Industrial Plant Safety' Scientific and Technical Conference. In addition, Grupa Azoty is a Strategic Partner of the Safe Chemicals Programme run by the Polish Chamber of Chemical Industry. The conferences provided a platform for meeting chemical safety experts, sharing experience and developing solutions that can be used at the Grupa Azoty plants.

Membership in associations

Grupa Azoty S.A. is a member of several dozen business, chemical industry and scientific associations and institutions. In 2023, these included:

1. Fertilizers Europe
2. Związek Pracodawców Business & Science Poland (Business & Science Poland Union of Employers)
3. IFA (International Fertilizer Industry Association)
4. Hydrogen Europe
5. CEFLEX
6. ECRST
7. AEGIS
8. The European Petrochemical Association (EPCA)
9. Polska Izba Przemysłu Chemicznego (Polish Chamber of Chemical Industry – PIPC)
10. European Clean Hydrogen Alliance

Grupa Azoty carries out a number of community-oriented projects to engage with its stakeholders. Grupa Azoty S.A. participated in environmental and educational campaigns, such as Dzień Tworzyw (Plastics Day), and Zbieram i segreguję (Collect and Sort). Project participants included Grupa Azoty S.A. employees and their families, local communities, and students from Tarnów and the Tarnów

region. As a socially responsible corporate citizen, Grupa Azoty promotes all efforts contributing to the improvement of Poland's ecological system.

How many complaints or grievances did the project receive from members of the public or civil society organisations during the reporting period? Please split by stakeholder group. Summarise any issues raised in the complaints or grievances and explain how they were resolved:

In the period under review, no complaints were raised by the local community.

9. Community Development

Please summarise any social or community development / investment initiatives undertaken by the Company during the reporting period, and any associated expenditure:

Grupa Azoty S.A. treats its social responsibilities and engagement with the communities in which it operates as matters of strategic and long-term importance. The multifaceted and advanced nature of these activities make the Group companies active participants of the local community life, providing support where it is most needed.

Social and sponsorship activities are carried out in accordance with the Group Policy and Rules of CSR and Sponsorship Activities, implemented in 2013, [the Grupa Azoty Group Sponsorship Policy and Strategic Directions, implemented in 2023](#), and the CSR Policy for Grupa Azoty Group Companies, implemented in 2020, while charitable activities are subject to the Grupa Azoty Group Companies Charitable Giving Policy, implemented in 2022, as well as the Donation Policy for Grupa Azoty Group Companies and the Grupa Azoty S.A. Donation Rules.

Grupa Azoty S.A. supports sports, cultural activities, education facilities for children and youth, medical facilities for employees and their families, research and scientific programmes, environmental initiatives in the region, and social initiatives. Through these activities, which include educational, cultural and sports projects, Grupa Azoty S.A. supports its local communities and regions, thus building and promoting their perception of Grupa Azoty as a valued and respected partner and neighbour. These efforts also contribute to a significant tightening and strengthening of positive relations with the immediate environment

and are directly linked to the objectives of the ESG Strategy, which forms part of the Grupa Azoty Group Strategy for 2021-2030. Care for social good is very high on the agenda of Grupa Azoty S.A., as demonstrated, among other things, by the Immediate Environment pillar, whose objectives are consistent with the UN Sustainable Development Goals 2030.

Development of the region

As part of its commitment to economic development and regional growth, in 2023 Grupa Azoty provided funding for harvest festivals in its region and supported various initiatives of local entities, including:

- PTTK (Polish Tourist Association) Branch at Grupa Azoty S.A. in Tarnów-Mościce;
- KANON Association;
- KANA Catholic Youth Education Centre;
- Pro-Patria patriotic historical association;
- Murawa Sports Development and Defence Promotion Foundation;
- AZOTY Tarnów Sports Association.

Development of education

In 2023, Grupa Azoty continued its collaboration with the Technical School Complex in Tarnów. As part of this collaboration, the Company plans to hire up to ten students annually, organise job training programmes, and offer support in preparing classes, organising trips, submitting EU funding

applications, and collaborating with research institutions and academic centres.

Grupa Azoty S.A. also actively collaborates with scientific institutions and academic centres. For decades, it has not only supported research into industrial technologies and techniques, but has also been actively involved in the organisation of educational projects.

In 2023, Grupa Azoty continued the Grupa Azoty Brand Ambassador Programme, aimed to build enduring relations between science and industry. The programme is addressed to undergraduate and graduate students, who are offered an opportunity to learn first-hand about working for the largest chemical company in Poland. The objective of the Programme is to select, through the process of recruitment, undergraduate, postgraduate or doctoral students of tertiary education institutions who will act as Ambassadors promoting the benefits of partnership with Grupa Azoty within their academic communities, including in particular by disseminating information on the areas and nature of the Group's business, available career paths and opportunities for professional development and building of competencies in order to forge long-lasting synergies between science and industry. The Programme ensures continuous exchange of experience and good practices. The activities of Ambassadors contribute to building the positive perception of Grupa Azoty as an employer, and they are also part of the Company's CSR agenda.

Programme participants are granted, among other things, a monthly Ambassador scholarship, the amount of which is determined by Grupa Azoty, as well as support for the Ambassadors' own scientific projects in accordance with the rules adopted by individual Group Companies.

In the sixth edition of the Ambassador Programme, Grupa Azoty (Tarnów, Puławy, Police, Kędzierzyn) was represented by a total of six Ambassadors from six universities:

- Politechnika Krakowska (Cracow University of Technology)
- West Pomeranian University of Technology in Szczecin
- University of Szczecin
- Warsaw University of Life Sciences in Warsaw
- University of Opole
- Jagiellonian University of Kraków

Main tasks of the Ambassadors in 2023:

- Promote the Grupa Azoty Brand through participation in job fairs, publications in university media, etc.
- Promote the Grupa Azoty product portfolio
- Run dedicated social media
- Organise webinars and Q&As with Grupa Azoty employees responsible for specific areas of Company operations
- Participate in faculty seminars and student study clubs

Partnership agreement between Grupa Azoty S.A. and the Tarnów Academy (formerly the University of Applied Sciences in Tarnów)

Under the agreement signed on 11 October 2021, Grupa Azoty S.A. and the Tarnów Academy (formerly the University of Applied Sciences in Tarnów) ran joint initiatives with the aim of achieving synergies between science and industry.

Initiatives under the agreement included:

- traineeships and internships for students at Grupa Azoty S.A.,
- provision of expert support for students working on graduation assignments or dissertations relating to the Group's business profile,
- employment of each other's specialists,
- provision of access to each other's research infrastructures,
- implementation of joint research and development projects and other initiatives (including participation in the Plastics Day and Tarnów Innovation Fair)

On 27 May – 28 May 2021, the national WorldSkills Poland qualifiers were held for the first time in the ‘Chemical Laboratory Technician’ category at Grupa Azoty S.A. in Tarnów. The event was held at the Research and Development Centre in Tarnów, in partnership with the Foundation for the Development of the Education System (FRSE).

The winner will represent Poland in the WorldSkills international competition in Shanghai 2022. Six competitors from all around Poland qualified to the local finals. The finals included practical laboratory tasks divided into four modules, as well as interviews and English tests. A six-person judging panel was appointed to ensure proper conduct of the competition.

During the event, a ‘Personnel of the Future’ debate was held, involving representatives of business and science. The competition was closed with a medal award ceremony held at the pilot-plant hall of Grupa Azoty’s R&D Centre, during which the winner received a token ticket to Shanghai.

WorldSkills is the world’s largest professional skills competition, held by a global organisation promoting professional skills excellence. The competitions are accompanied by various presentations, demonstrations, exhibitions, conferences and industry seminars. The WorldSkills competition is held every two years alternately with the EuroSkills event (its European equivalent). The competitions attract best-in-class young talent representing each industry. EuroSkills and WorldSkills events are grouped into six industry sectors, and contestants compete for three or four days, respectively, in more than 60 skills competitions. The project builds a global skills platform, thereby having a significant impact on the industry and services sectors, governments’ focus on vocational education, as well as numerous educational initiatives. Grupa Azoty is Poland’s first major industry partner involved in such wide-ranging promotion of vocational education among secondary school students and undergraduates of tertiary education institutions. Grupa Azoty actively supports the winner of the WorldSkills qualifier in the ‘chemical laboratory technician’ category, who will represent Poland in the international competition, including through the organisation of apprenticeships and internships at the Grupa Azoty research units and by providing mentoring and advisory support.

Development of sports

For years now, Grupa Azoty S.A. has been involved in supporting various sports disciplines: ski jumping, volleyball, speedway, football as well as track and field. Support is also provided to local individual athletes and sports clubs, including:

- Grupa Azoty Akademia Tarnowska (volleyball),
- Grupa Azoty Unia Tarnów (handball),
- ZKS Unia Tarnów Sports Club (football),
- Unia Tarnów Żużlowa Sportowa Spółka Akcyjna (speedway).

Grupa Azoty also partnered with Tarnów-born kart driver Maciej Gładysz, who achieved 20th place in the 2023 European Championship and also tested Formula 4 cars.

Grupa Azoty S.A. reaffirmed its patronage of the Cavaliada Tour in Kraków, the largest series of equestrian competitions in Poland featuring nearly 300 riders from 25 countries.

In 2023, the Group extended its assistance to Akademia Unia Tarnów as part of the Sports Championship School initiative. This collaboration includes the implementation of the PRO JUNIOR SYSTEM Programme, which consists of three pillars: 1) organising classes in kindergartens and primary schools (grades 1-3) in Tarnów County, 2) partnering with clubs to execute a proprietary training plan for athletes based on the National Football Game Model and guidelines of the Polish Football Association (PZPN); and 3) offering sports scholarships to the School students for their

athletic achievements.

In 2023, the Grupa Azoty Group continued the first edition of the Grupa Azoty START programme launched at the end of 2022, having provided a total of PLN 365 thousand in support to 32 entities. The funding was provided to schools and organisations offering sports activities and training for children and youth aged 5 to 19.

The programme aims to cultivate the next generation of athletes and nurture young talent through sports and healthy competition, emphasising values such as mutual respect, integrity, and the principles of fair play.

The Grupa Azoty START Sponsorship Programme aligns directly with the goals of the ESG Strategy, a key component of the Grupa Azoty Group's strategy for 2021-2030, which places a strong emphasis on societal welfare.

In building the strength of its brand, the Grupa Azoty Group supports Poland's best athletes. Its partnership also covers nationwide sports events, and the best known initiative is the cooperation with the Polish Skiing Association as the Main Partner. As part of this cooperation, the Group has for many years supported, among others, the Polish ski jumping team. The Group's support for winter sports takes various forms, including the sponsoring of individual athletes (Piotr Żyła, Jakub Wolny) or acting as the main sponsor of major sports events in Poland (the FIS Ski Jumping World Cup competitions in Wisła and Zakopane).

The Group has also taken under its wing Malwina Kopron, a Polish athlete specialising in hammer throw and a bronze medallist of the [2021 Summer Olympic Games](#).

The Grupa Azoty Group has also supported MMA and boxing galas.

Furthermore, the Group took patronage of the GRUPA AZOTY ARENA Sports Hall in Puławy, one of the main training facilities built to accommodate handball, volleyball, and basketball teams, showcasing impressive design and modern technology.

Development of culture

In 2023, Grupa Azoty continued its support for the following cultural institutions, recognising the invaluable role of culture in shaping both individual and collective identity:

- Krzysztof Penderecki European Centre for Music in Luśtawice - a modern world-class campus in Luśtawice, realising Krzysztof Penderecki's vision of a unique international music centre;
- Paderewski Centre in Kaźna Dolna - the centre has been preserving the memory of Ignacy Jan Paderewski for over 30 years as part of cultural activities in Tarnów County;
- Mościce Art Centre - a cultural institution focused on cultural education and art-based education, providing a platform for talent development and fostering creativity.

Protection of life and health

Recognising the importance of activities for the protection of human health and life, Grupa Azoty provided assistance to:

- Tytus Chałubiński Club of Polish Red Cross Honorary Blood Donors at Grupa Azoty S.A.;
- Prometeusz Association for the Assistance to the Disabled Children and Their Families;
- Słoneczko Disabled Persons Support Foundation;
- Military Institute of Medicine - National Research Institute;
- Voluntary Fire Brigades.

In 2023, the Tytus Chałubiński Club of Polish Red Cross Honorary Blood Donors at Grupa Azoty S.A. supported by the Company organised five field blood donation drives at Grupa Azoty S.A., having collected a total of 87,300 ml of whole blood.

Environmental protection initiatives

Continuing its environmental protection initiatives, the Group also progressed with a project to establish beehives in green areas near the Grupa Azoty Group's Research and Development Centre in Tarnów.

PLASTICS DAY AT GRUPA AZOTY

The Plastics Day was an event held in front of the Grupa Azoty Group's headquarters in Tarnów in June. During the event, Company representatives demonstrated a range of exhibits to illustrate how plastics have changed over years and how they influenced various areas, including the automotive, medical, and defence industries. The event attracted a total turnout of several hundred, including children, students and residents of Tarnów.

During the Plastics Day, Grupa Azoty employees stressed the multitude of opportunities offered by plastics, but also the fact that they called for a professional approach at the product design and manufacturing stage, as well as a focus on ensuring their recycling and circular reuse, which is why education and awareness of the benefits and challenges associated with plastics were so important. For advanced applications, the properties of plastics need to be specifically tailored and modified with various additives. This is what the Grupa Azoty Group's laboratories and compounding facilities specialise in.

COLLECT AND SORT

The joint campaign of Grupa Azoty S.A. and the Mościce Housing Estate Council on the occasion of the World Earth Day. The Collect and Sort event, with its motto 'You can do more than you think,' brought together approximately 700 residents of Tarnów, including employees of Grupa Azoty, preschoolers, and schoolchildren. Together, they collected around 1,240 kg of waste.

The initiative aimed to highlight the importance of responsible choices in environmental care, which is why the motto 'You can do more than you think' was chosen. As a manufacturer of plastics and other materials, the Grupa Azoty Group emphasised the significance of proper recycling practices.

EMPLOYEE VOLUNTEERING

In 2023, Grupa Azoty successfully completed the second edition of its Grupa Azoty Group Employee Volunteering Programme, which garnered even greater interest than its inaugural edition. Over PLN 80,000 was allocated for this initiative. Out of 32 projects submitted by employees, 14 projects were selected and implemented across Poland. Nearly 150 people participated in the volunteering activities, and each project received PLN 6 thousand in financial support from Grupa Azoty S.A. Volunteers undertook diverse initiatives such as creating an ecological educational trail in a kindergarten garden, establishing a therapeutic room for children and young people, installing nesting boxes and feeders, setting up a bicycle parking with green areas near a school, organising sensory workshops, developing a green zone for outdoor comfort and relaxation, and creating an ecological space to promote library use;

ENVIRONMENTAL AND SOCIAL ACTION PLAN

Table 0.1 Wista Project, Grupa Azoty Poland - Environmental, Social, Health and Safety (ESHS) matters,
Updated (Alchemist Project)
Action Plan:

GRUPA AZOTY S.A.

No.	Action	Environmental risks, liabilities/benefits	Legislative requirements/Best practice	Requirement/Resources	Scheduled completion - action to be completed by end of year	Target and evaluation criteria for implementation progress	Comments
<i>0. General – Management, Environmental, and OHS matters - management at the corporate level of Grupa Azoty</i>							
0.1	Develop and implement a new management structure, including EHS matters, as part of the merger of the Grupa Azoty and Puławy Groups	EHS performance monitoring, maintaining minimum EHS risk at corporate level	Best practice, the Bank's Performance Requirements ("PRs" or "Performance Requirements") (1, 2, 3 and 10)	Internal resources	Ongoing; Please provide update in the annual report.	Conduct operations in line with Polish and EU requirements and follow the Bank's PRs (particularly 1, 2, 3 and 10)	The resulting new structure will be presented in an appropriate internal executive order of the Group management
<p>Information: Management standards - Grupa Azoty has implemented a management framework based on international standards. In selected areas, implementation of the standards has been confirmed with relevant certificates issued by independent bodies. The Grupa Azoty Group is committed to observing corporate governance principles, including compliance with best business practices set out in 'Best Practice for WSE Listed Companies'. The Code of Best Practice is applied both at the parent company and in relations with the Group subsidiaries. Corporate governance principles are set out at the Grupa Azoty Group companies, in their respective rules and other internal regulations. The general plans and directions for Grupa Azoty are defined in the adopted Grupa Azoty Strategy for 2021-2030, which outlines the mission, vision and strategic objectives of the Group companies, and takes into account the management standards adopted for application by Grupa Azoty. According to its mission, Grupa Azoty:</p> <ul style="list-style-type: none"> • Manufactures fertilizers, plastics and chemical products in harmony with the environment. • Improves the well-being of people living in Europe and actively contributes to building our continent's food security. <p>The Group companies pursue strategic objectives based on management systems conforming to the highest international standards. Operating priorities, such as high quality, care for technical safety and the environment, health safety of food, process safety, reducing environmental losses, energy efficiency improvement, giving priority to customers, are all efficiently monitored and ensure effective management.</p>							

The organisational and management approach to standardisation at Grupa Azoty is governed by relevant policies, rules, procedures and instructions.

In its operations, the Group complies with all applicable laws and regulations and strives to constantly improve the results of its operations, while minimising the associated risks.

The Grupa Azoty Group is an international corporation integrating European chemical sector companies, with its own research, development, logistics and technical facilities. The parent of the Group, responsible for its strategy and corporate governance, is Grupa Azoty S.A.

Corporate governance at the Grupa Azoty Group is guaranteed by the exercise of powers of the corporate governing bodies of Grupa Azoty S.A.: the General Meeting, the Supervisory Board, and the Management Board.

The Grupa Azoty Group consolidation process has created potential for further gains. In order to ensure more effective management of the Group, a system of management by business segments has been implemented.

In line with the model's assumptions, functions offering the strongest synergies are centralised and main processes are managed at the Group level, with the identities of Grupa Azoty Group companies preserved.

At present, Grupa Azoty has a management model based on a process-based division of responsibilities and remits within the Group's Management Board. The current management model ensures delivery of the Grupa Azoty Group's Strategy, achievement of synergies, as well as efficient and effective decision making by the Grupa Azoty Management Board, while preserving the identities of the subsidiaries.

The pillars of the current management framework are process leaders (individual members of the Grupa Azoty Management Board responsible for their respective processes), defined decision paths, decision-making transparency, and an incentive scheme, which ensure direct delivery and communication of the developed strategy and strategic objectives.

Members of the Grupa Azoty Management Board are process leaders with uniform decision-making powers to prepare organisational and HR decisions (appointments and target setting), which are then approved by the Grupa Azoty Management Board or the management boards of subsidiaries.

The President of the Management Board of Grupa Azoty S.A. exercises overall supervision of the Group at the corporate level. In its management of the Group and supervision of the business segments and support functions, the Grupa Azoty Management Board is supported by the Grupa Azoty Council, standing advisory and consultative committees, process and project steering committees, as well as Corporate Departments and Offices, and tiered decision-making positions. Under the management model rolled out at the Grupa Azoty Group, key corporate processes are managed at the Group level. The model adopted for the Grupa Azoty Group's structure and governance envisages an interdependent management system based on a configuration of the organisational structure and process-based structure consisting of identified processes.

The functioning of the management model of the Grupa Azoty Management Board and of the subsidiaries' management boards is further reinforced by the following principles adopted at the Group:

- the Grupa Azoty Group management model provides for preserving the subsidiaries' identities, locations and legal autonomy;
- the Grupa Azoty Group management model provides for centralising functions offering the strongest synergies, economies of scale, and specialisation;
- the Grupa Azoty Group management model provides for centralising functions offering the strongest synergies, economies of scale, and specialisation;
 - the Grupa Azoty Group operates as a single entity based on its four key companies;
 - members of the Grupa Azoty Management Board - the leaders of main corporate processes - ensure joint operation to achieve strategic and financial objectives of the Grupa Azoty Group by driving the effects of business processes at the Group;

- at the Grupa Azoty Group, opinions of the management boards of Group subsidiaries are taken into account when making decisions with a material effect on the subsidiaries' financial performance; if no agreement can be reached between a process leader and the subsidiaries' management boards, the decision is made by the Grupa Azoty Management Board;
- all activities and decisions at the Group are transparent to all parties involved.

Below is presented a description of the actions and initiatives related to the implemented management model, which are taken or conducted as part of the consolidation process with respect to a number of organisational, formal and legal aspects.

Formal and legal aspects:

- Preparation and implementation of Internal Audit Standards for Grupa Azoty and Grupa Azoty S.A. Internal Audit Rules;
- Preparation and implementation of the Financial (Currency and Interest Rate) Risk Management Policy for the Grupa Azoty Group;
- Preparation and implementation of a joint model for managing CO₂ emission allowances at the Grupa Azoty Group companies;
- Preparation and implementation of the Framework Procedure for Disposal of Perpetual Usufruct Rights, Ownership Rights to Real Property, or Interests in Such Rights, at the Grupa Azoty Group Companies;
- Preparation and implementation of the Financing and Liquidity Management Policy for Grupa Azoty;
- Preparation and implementation of the Uniform Procurement Regulations at the Grupa Azoty Group;
- Preparation and implementation of a document drafting policy for related-party transactions at the Grupa Azoty Group;
- Preparation and implementation of guidelines on submitting investment plans and preparing investment projects at the Grupa Azoty Group Companies;
- Preparation and implementation of methodology assumptions for project efficiency analysis at the Grupa Azoty Group;
- Preparation and implementation of guidelines for the allocation of umbrella facility sublimits between Grupa Azoty Group companies;
- Preparation and implementation of the Vehicle Fleet Management Rules at the Grupa Azoty Group;
- Preparation and implementation of document forms relating to the processing of personal data in accordance with the applicable laws (e.g., the GDPR);
- Preparation and implementation of the General Personal Data Protection Policy for Grupa Azoty S.A.;
- Preparation and implementation of the Grupa Azoty Register of Corporate Risks and List of Key Risks;
- Preparation and implementation of arrangements to meet the obligations under the EMIR regime and collection of transaction data;
- Preparation and implementation of the Grupa Azoty Group Contracting and Contract Performance Manual;
- Preparation and implementation of the Rules of operation for the ICT function at Grupa Azoty;
- Preparation and implementation of the Grupa Azoty Group Communication Policy;
- Preparation and implementation of the CSR Policy for Grupa Azoty Group companies;
- Preparation and implementation of the Information Policy at Grupa Azoty;
- Preparation and implementation of the Credit Risk Management Policy for Trade Credit at the Grupa Azoty Group;
- Preparation and implementation of the 'Policy on social media activities of the Grupa Azoty Group employees';
- Preparation and implementation of the Information Security Policy at the Grupa Azoty Group;
- Preparation and implementation of the Data Retention and Minimisation Policy at Grupa Azoty S.A.;
- Preparation and implementation of the Anti-Bullying and Anti-Discrimination Policy at Grupa Azoty S.A.;

- Preparation and implementation of the Accounting Policies at the Grupa Azoty Group;
- Preparation and implementation of the Code of Conduct for Business Partners of the Grupa Azoty Group companies;
- Preparation and implementation of the Compliance Regulations;
- Preparation and implementation of the 'Rules of providing support to Grupa Azoty S.A.'s governing bodies';
- Preparation and implementation of the 'Rules for recording contracts and orders in the SAP system';
- Preparation and implementation of the 'Rules for managing the Logintrade Procurement Platform system';
- Preparation and implementation of the 'Rules for managing the ZEUS IT system';
- Preparation and implementation of the 'Rules of Lease and Rental of Grupa Azoty S.A.'s Property';
- Preparation and implementation of the 'Rules of Sale of Grupa Azoty S.A.'s Real Property';
- Preparation and implementation of the 'Rules for managing the LOG System at Grupa Azoty';
- Preparation and implementation of the 'Rules for managing Microsoft-based IT systems at Grupa Azoty';
- Preparation and implementation of the 'Rules of the Corporate Committee for Hedging the Prices of Natural Gas and CO₂ Emission Allowances at the Grupa Azoty Group';
- Preparation and implementation of the 'Rules for keeping the accounting records - a description of the data processing system at the Grupa Azoty Group companies covered by a common SAP instance';
- Preparation and implementation of a list of jobs performed by at least two persons;
- Preparation and implementation of the high risk goods security plan for railway transport;
- Preparation and implementation of the rules of fulfilling the obligation to inform the Supervisory Board of the current situation of Grupa Azoty S.A.;
- Preparation and implementation of the Corporate Legal Service Rules at the Grupa Azoty Group;
- Preparation and implementation of the Donation Rules of Grupa Azoty S.A.;
- Preparation and implementation of information used for the purpose of calculating property and agricultural taxes;
- Preparation and implementation of qualification requirements for persons operating power equipment, systems and networks;
- Preparation and implementation of the Land Management Rules at Grupa Azoty S.A.;
- Preparation and implementation of the Inventory Taking Rules at Grupa Azoty S.A.;
- Preparation and establishment of Divisional Emergency Response Groups at Grupa Azoty S.A.;
- Preparation and implementation of the Principles of describing and posting in SAP of documents which confirm the purchase of limited intangible services from related parties and from entities in tax havens;
- Preparation and implementation of WHT (withholding tax) and associated obligations;
- Preparation and implementation of the Basic Screening Procedure for Third-Party Trading Partners of Grupa Azoty Group Companies;
- Preparation and implementation of Taxation of Goods Provided Free of Charge;
- Preparation and implementation of Regulations for Remote Work During the COVID-19 Pandemic and a State of Epidemic Emergency;
- Preparation and implementation of the Charitable Policy for Grupa Azoty Group companies;
- Preparation and implementation of the Donation Policy for Grupa Azoty Group Companies;
- Preparation and implementation of the Industrial Accident Prevention Programme at Grupa Azoty S.A.;
- Preparation and implementation of the Employee Innovation Rules at the Grupa Azoty Group and the Intellectual Property Management Policy for

the Grupa Azoty Group;

- Preparation and implementation of Functioning of the SAP ERP System at Grupa Azoty S.A.;
- Preparation and implementation of Recording and Trading in Excise Goods and Excise Tax Reporting;
- Preparation and implementation of the Policy for Managing the Market Risk of Gas Price Change for 2022-2023 at the Key Companies of the Grupa Azoty Group;
- Preparation and implementation of Preparation, Authorisation, Publication and Purpose of Separate and Consolidated Periodic Reports at the Grupa Azoty Group;
- Preparation and implementation of the Work Rules of Grupa Azoty S.A.;
- Preparation and implementation of the Strategy for Azoty Group's Communication with Capital Market Participants;
- Preparation and implementation of Establishment of Production Zones and Administration Zones.

Organisational aspects:

- Introduction of organisational changes in the Corporate Safety Department;
- Introduction of organisational changes in the Corporate Finance Department and Corporate Logistics Department;
- Introduction of changes in the Plastics Segment, Infrastructure Centre, Research and Analysis Centre;
- Liquidation of the Corporate Legal and Compliance Department and the position of Legal Counsel - Coordinator - Head of the Corporate Legal and Compliance Department; Transformation of the position of Compliance Manager, formerly within the structure of the Corporate Legal and Compliance Department, into an independent decision-making position reporting directly to the President of the Company's Management Board; Liquidation of the BSC Team in the Corporate Supervision Office of the Corporate Supervision Department; Renaming of the Corporate Supervision Department as Corporate Supervision and Legal Department; Replacement of the existing position of Head of the Corporate Supervision Department with Head of the Corporate Supervision and Legal Department;
- Introduction of changes to the organisational structure of Grupa Azoty S.A.;
- Appointment of the Finance Committee at Grupa Azoty;
- Appointment of the Procurement Committee at Grupa Azoty;
- Appointment of the ICT Steering Committee;
- Appointment of the Ammonia Team;
- Appointment of the Corporate Energy Transition Committee;
- Appointment of the Enterprise Risk Committee;
- Appointment of the Corporate Committee for Hedging the Prices of Natural Gas and CO₂ Emission Allowances;
- Appointment of the Personal Data Protection Committee at the Grupa Azoty Group;
- Appointment of the Corporate Logistics Committee;
- Appointment of the Corporate Committee for Integration of Production Processes at Grupa Azoty;
- Appointment of the standing Energy Management Team at Grupa Azoty S.A.;
- Appointment of the Working Group to implement the 'Development of a new generation catalyst for a low-temperature hydrogen and syngas production process' project;
- Appointment of the Project Team at Grupa Azoty S.A. to implement the 'Speciality ammonium nitrate-sulfate fertilizer products with functional additives' project;

	<ul style="list-style-type: none"> • Appointment of the Team to update the records for the upper-tier establishment; • Appointment of the Wastewater Management Team at Grupa Azoty S.A.; • Appointment of the Working Group to explore potential synergies and develop a model of cooperation between the PA6 and PP plastics areas at Grupa Azoty; • Appointment of the Sulfur and Sulfuric Acid Team at the Grupa Azoty Group; • Appointment of the Catalysts Management Team at the Grupa Azoty Group; • Update of the composition and scope of responsibilities of the National Recovery Plan Team; • Appointment of the OHS Committee; • Appointment of a Carbon Footprint Team at Grupa Azoty; • Appointment of a team to exercise direct supervision over the implementation of strategic investment projects; • Appointment of a team to develop an intellectual property management strategy for Grupa Azoty S.A. and the Grupa Azoty Group; • Appointment of a Task Force for the acquisition of Compo Expert Polska Sp. z o.o. by Agrochem Puławy Sp. z o.o.; • Appointment of the BREF LVIC Corporate Team; • Appointment of the Working Group to draw up the document ‘Operationalisation of the Grupa Azoty Group’s Strategy for 2021–2030’; • Appointment of a coordination team in view of the threat to operational safety and continuity of production in connection with Russia’s aggression in Ukraine; • Appointment of a Corporate Team to implement the new Fertilizer Regulation in the Grupa Azoty Group; • Appointment of the Working Group to optimise and expand the Procurement Platform. 						
0.2	<p>As part of new EHS management structure - maintain and further develop existing EHS management systems (such as ISO 14001, OHSAS 18001, etc.); by 2015 develop and implement energy management systems for the Group in line with ISO 51001.</p> <p>The target is to achieve a 10% energy intensity reduction by 2016 compared with 2012, with a long-term objective of a 15% reduction.</p>	<p>Following completion of the merger, the Company will maintain EHS management systems and develop such systems throughout Grupa Azoty, both at the Group and subsidiary levels.</p> <p>The Company will also address energy efficiency at the Group and subsidiary levels, and implement an energy management system to reduce energy intensity through BAT (Best Available Technology) implementation and to reduce carbon dioxide emissions.</p>	EBRD PR 1 and best practice	Internal resources	Completed	<p>Regular certification of EHS management systems</p> <p>Objective: obtain ISO 51001 certification in 2015</p>	
Information:							

Management systems - Grupa Azoty has implemented the Integrated Management System based on international standards and structured around the principles of giving priority to customers, reducing environmental losses and mitigating the risk of hazards, as well as continuous improvement. The Parent has implemented:

- Quality Management System compliant with ISO 9001:2015,
- Environmental Management System compliant with ISO 14001:2015,
- Energy Management System compliant with ISO 50001:2018,
- Occupational Health and Safety Management System compliant with ISO 45001:2018,
- Food Safety Management System compliant with ISO 22000:2018,
- PN-EN ISO/IEC 17025:2018 Management System (general requirements for the competence of testing and calibration laboratories),
- Management Standard compliant with the Fertilizers Europe Product Stewardship Standard,
- Information security management system ISO/IEC 27001:2013,
- System International Sustainability & Carbon Certification Plus (ISCC PLUS).

In 2023, the Group companies maintained and improved their management systems. The operating priorities: high quality and care for technical safety and the environment, are all efficiently monitored and facilitate effective management. The validity of certificates confirming the systems' compliance with relevant standards and requirements was maintained. Improvements were also made based on findings of external and internal audits of the certified management systems, and conclusions of the Management Review. The Grupa Azoty Group integrates its management systems on an ongoing basis and continuously monitors changes in laws, regulations and standards. It takes adaptive measures to ensure that its management systems are compliant with evolving certification standards.

In the reporting period, the management systems at the Grupa Azoty Group companies were adapted to conform to the relevant standards. Compliance of the management systems with the standards has been certified by independent certification bodies.

The systems implemented by the Grupa Azoty Group companies include:

- Quality Management System conforming to the ISO 9001 standard,
- Environmental Management System conforming to the ISO 14001 standard,
- Energy Management System conforming to the ISO 50001 standard,
- Occupational Health and Safety Management System conforming to ISO 45001,
- Food Safety Management System conforming to the ISO 22000 standard,
- PN-EN ISO/IEC 17025 Management System (general requirements for the competence of testing and calibration laboratories),
- Product Stewardship Management Standard.

For more information, see the websites of individual Grupa Azoty Group companies.

In 2023, external audits were carried out at Grupa Azoty Group Companies by the relevant certification bodies. The audit findings were positive, supporting extension of the validity of the respective certificates.

0.3	<p>As part of EHS management, the Company will develop its own procedure for assessing EHS provisions and contingent liabilities to enable:</p> <p>a) their initial assessment, and b) annual verification of their amounts in accordance with IFRS.</p> <p>The initial assessment will be made in 2013 in the consolidated statement of profit or loss and in updated financial statements accounting for the provisions and contingent liabilities.</p> <p>The system will be verified by an independent qualified auditor as part of a financial audit.</p>	<p>EHS performance monitoring, maintaining minimum EHS risk at corporate level</p> <p>The system will then be audited and reviewed by an independent financial auditor. If necessary, the procedure will be updated to enable an appropriate assessment of environmental liabilities and contingent liabilities.</p> <p>Technical, financial and legal departments of the Company will be involved. Appropriate legal advice will also need to be obtained.</p> <p>The consultant believes that the current provision for soil and groundwater clean-up is insufficient and should be increased (in particular for costs of mercury clean-up in Tarnów, as well as demolition work). An initial assessment by Environ is that a provision of EUR 10m should be recognised in the full-year financial statements for costs related to the Wisła landfill site as well as for additional contingent liabilities related to mercury clean-up in Tarnów. However, this needs to be verified.</p>	Best practice, Bank's PRs	Internal resources	Ongoing; to be completed by the end of 2015.	Annual financial report with clear estimation of potential extraordinary threat to the environment	<p>The result/new system presented in an appropriate internal executive order of the Group management</p> <p>In pursuit of this objective, the Management Board will rely on IFRS and EU Guidelines</p>
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Information:

In 2023, the work on decommissioning the inactive Mercury Electrolysis Plant was commenced in accordance with the executed agreement.

It consists in demolition of the existing facilities as well as collection and disposal of the resulting waste. In 2023, the value of work performed was PLN 9,066 thousand and was recognised as use of the provision.

As at 31 December 2023, the provision was estimated at the amount of costs necessary to carry out the work. Further remediation work is planned for 2024-2025.

The present value of the long-term provision for decommissioning the inactive Mercury Electrolysis Plant was calculated as at 31 December 2023 and 31 December 2022 without using a discount rate due to the short time horizon of using the provision.

0.4	<p>The Company will maintain adequate provisions and contingent liabilities in the full-year financial statements for reasonably anticipated costs. The provisions and contingent liabilities will be audited and updated as part of a financial audit every three years to ensure that adequate provisions are maintained and that environmental, health and safety liabilities are correctly assessed, quantified and reflected in the financial statements.</p> <p>The provisions need to be independently reviewed by technical advisers every three years. Such review, including a technical opinion on the provisions and contingent liabilities, will take place every three years, or in the event of a material change to accounting assumptions, or as required by accounting advisers.</p>	<p>The technical basis for any provision or contingent liability will be the subject of a full technical review by a suitably qualified independent technical advisor in 2015. The scope of work is to be agreed upon with the Financial Auditor.</p> <p>As part of the financial audit, an independent auditor will approve the relevant provision.</p> <p>The purpose of the provisions is to:</p> <ul style="list-style-type: none"> – ensure that all regulatory requirements, including periodic orders or demands by environmental authorities, are complied with; – ensure availability of a provision for liabilities related to the landfill site closure and after-care costs; and – ensure that all other legal requirements or requirements necessary to manage potential environmental liabilities are complied with. 	IFRS, EBRD, EU directive requirements	External consultant/auditor	Recognition of provisions and regular remeasurement of provisions and contingent liabilities	Summary in annual report Information in annual report	
<p>Informations: The Company maintains an appropriate level of provisions, which is reviewed every year by the Financial Auditor. The provisions for 2023 were reviewed by the Auditor, BDO Spółka z ograniczoną odpowiedzialnością sp. komandytowa, in the course of the accounting audit.</p>							

0.5	In the event of a site closure or sale, the Company will undertake an environmental assessment to identify its environmental or social liabilities prior to the closure/sale. This will include, if needed, retrenchment plans to ensure compliance with the EBRD Performance Requirement 2, as well as development and implementation of remediation plans based on a site-specific risk assessment to limit the risk to the environment and humans from contamination that is or may be present at, or that may originate from, the site or result from the Company's activities.	For each such site, the Company: – will maintain a financial mechanism to implement a remediation plan in case of contamination, as well as a plan for closure or after-care of the site, including a landfill site, or restructuring or retrenchment, to the extent that, in the event of its sale, the liability and costs are not borne by the buyer, in a manner which will ensure that any related liabilities do not revert to the Company, its shareholders or its parent, and – will agree on the financial mechanism with the parent prior to the closure or sale.	IFRS	Internal resources/accounting/consultant	2013 onwards	Annual report for the shareholders	Please provide a summary in the 2016 annual report.
<p>Information: The financial statements for 2023 are being audited by the Auditor, BDO Spółka z ograniczoną odpowiedzialnością sp. komandytowa, in the course of the accounting audit.</p>							
0.6	Develop a new Corporate Social Responsibility (CSR) programme for the entire Grupa Azoty Group	Social impact monitoring, maintaining minimum CSR in accordance with the GRI (Global Reporting Initiative).	Best practice, Bank's PRs (PR 1, 2, 4 and 10)	Internal resources	Ongoing;	Information in the annual report.	To be updated every year
<p>Information: Grupa Azoty S.A. carried out the following Corporate Social Responsibility projects:</p> <ul style="list-style-type: none"> • In 2021, the Company developed an ESG Strategy as part of the Grupa Azoty Group Strategy for 2021-2030, while also incorporating into its operations the UN Sustainable Development Goals (SDGs) applicable to the chemical industry; • Integrated Report for 2023; <p>The Integrated Report covers the four largest companies of the Grupa Azoty Group: Grupa Azoty S.A., Grupa Azoty PUŁAWY, Grupa Azoty POLICE and</p>							

Grupa Azoty KĘDZIERZYN.

Strategic pillars underpinning Grupa Azoty's ESG Strategy

Pillar 1: Climate and environment

Our priorities

- Decarbonisation and emissions reduction
- Energy transition
- Energy efficiency

Pillar 2: Sustainable products

Our priorities

- Circular economy
- Sustainable agriculture
- Green products

Pillar 3: Sustainable supply chain

Our priorities

- Cooperation based on shared values and goals
- Shared responsibility for the climate, environment and society
- Shared responsibility for shaping the value chain

Pillar 4: Immediate environment

Our priorities

- Partnership of equals as a key development driver for the organisation and region
- Responsibility for the immediate environment
- Stakeholder dialogue

Pillar 5: Friendly and safe workplace

Our priorities

- Equality, diversity, openness
- Employee safety
- Professional development

0.7	<p>Provide the Bank with a report on the status of implementation of IED (Industrial Emissions Directive) and EU ETS requirements by Grupa Azoty as part of annual reports submitted to EBRD.</p> <p>The report also includes information on the status of projects in progress and projects planned to ensure compliance after 2016.</p> <p>An independent audit is to be undertaken in 2015.</p>	<p>Update of the road map for maintaining compliance with the Industrial Emissions Directive by all Grupa Azoty Group production plants.</p> <p>A schedule for an independent audit of IED BAT compliance will be developed in 2015, taking into account compliance post 2016.</p> <p>Provide information in the annual report on any material instances of non-compliance, accidents/incidents, or investment needs as agreed with regulators.</p>	Legislative requirements and best practice	Internal resources	BAT assessment in 2015	<p>Information in the annual report on progress status.</p> <p>In 2015, provide the Bank with an executive summary of the BAT assessment and ESAP implementation.</p>	<p>As part of the annual report for 2016, the Company will provide updated information on steps taken to ensure continuous compliance with BAT, and will identify the specific BAT requirements to be implemented within four years of adoption of the new Best Available Techniques Reference Document ("BREF")</p>
<p>Information:</p> <p>In 2017, the construction of flue gas NOx removal and desulfurisation systems at GA S.A. was completed. The projects were undertaken to ensure compliance of the Company's industrial combustion sources with the requirements laid down in the Minister of Environment's Regulation on emission standards for installations of 22 April 2011 and the Industrial Emissions Directive. As a result, the amount of pollutants released into the environment by the combustion sources has been reduced, improving air quality. The projects were co-financed under the Norwegian Financial Mechanism 2009-2014. Capital expenditure on the flue gas desulfurisation and particulates extraction project totalled PLN 45,369 thousand, and capital expenditure on the flue gas deNOX project totalled PLN 44,498 thousand.</p> <p>In 2019, GA S.A. initiated projects designed to bring the Company's heat and power generation activities in line with the more stringent environmental requirements arising from BAT conclusions (Commission Implementing Decision 2017/1442/EU of 31 July 2017 establishing best available techniques (BAT) for large combustion plants). The projects were continued in 2022. They included adjustment of the FGD absorption unit on the K5 boiler to the requirements of BAT conclusions and upgrade of the K1 gas-fired boiler to secure a peak-load/reserve source for Grupa Azoty S.A. that would meet the emission requirements arising from BAT conclusions, and were completed and commissioned in 2023. In 2023, capital expenditure on those projects totalled PLN 2,820 thousand.</p>							

0.8	Ensure that Grupa Azoty has valid IPPC/IED permits and is in compliance with Polish and EU requirements.	Ensure ongoing compliance with IPPC and IED.	Legal requirements	Internal resources	Ongoing	Provide update on status in the annual report submitted to the Bank.	
<p>Information: Currently, Grupa Azoty S.A. operates pursuant to the following decisions:</p> <p>Integrated permits:</p> <ul style="list-style-type: none"> • Decision by the Marshal of the Kraków Province dated 20 June 2012 Ref. No. SR-II-1.7222.1.1.2012, granting an integrated (IPPC) permit to Zakłady Azotowe w Tarnowie-Mościcach for the Hydrogen Unit, valid for an indefinite term (permit amended by Decision of 3 December 2014 Ref. No. SR-II-1.7222.2.13.2014); • Decision by the Governor of the Kraków Province dated 16 February 2007 Ref. No. ŚR.XIV.JI.6663-6-05, granting an integrated (IPPC) permit to Zakłady Azotowe w Tarnowie-Mościcach for the Park Infrastruktura Complex, valid for an indefinite term (permit amended by Decision dated 29 July 2011, Ref. No. SR-II-1.7222.1.3.2011; Decision dated 11 September 2012, Ref. No. SR-II-1.7222.1.7.2012; Decision dated 3 December 2014, Ref. No. SR-II-1.7222.2.17.2014; Decision dated 31 December 2015, Ref. No. SR-II-1.7222.2.1.2015; Decision dated 10 March 2017, Ref. No. SR-II.7222.2.9.2016; Decision dated 22 June 2020, Ref. No. SR-II.7222.2.4.2020; Decision dated 12 August 2020, Ref. No. SR-II.7222.2.28.2019; and Decision dated 22 June 2022, Ref. No. SR-II.7222.2.22.2021); • Decision by the Governor of the Kraków Province dated 17 April 2007 Ref. No. ŚR.XI.JI.6663-3-06, granting an integrated (IPPC) permit to Zakłady Azotowe w Tarnowie - Mościcach for the POM Manufacturing and Compounding Complex, valid for an indefinite term (permit amended by Decision of 29 July 2011 Ref. No. SR-II-1.7222.1.1.2011 and Decision of 3 December 2014 Ref. No. SR-II-1.7222.2.14.2014); • Decision by the Governor of the Kraków Province dated 29 July 2011 Ref. No. SW.II.1.AJ.7673-10/09, granting an integrated (IPPC) permit to Zakłady Azotowe w Tarnowie - Mościcach for the Technical Grade Nitric Acid Unit, Calcium Ammonium Nitrate and Ammonium Nitrate Unit, Nitrogen Fertilizer Granulation Unit, and Dolomite Milling Unit, valid for an indefinite term (permit amended by Decision of 3 December 2014 Ref. No. SR-II-1.7222.2.15.2014, Decision of 16 August 2016 Ref. No. SR-II.7222.2.8.2016, Decision of 21 July 2017 Ref. No. SR-II.7222.2.27.2016, Decision of 18 January 2018 Ref. No. SR-II.7222.2.34.2017); and Decision of 7 December 2023 Ref. No. SR-II.7222.2.20.2021.AnJ; • Decision by the Governor of the Kraków Province dated 17 July 2007 Ref. No. ŚR.XIV.JI.6663-2-06, granting an integrated (IPPC) permit to Zakłady Azotowe w Tarnowie-Mościcach for the Caprolactam and Polyamide Manufacturing Complex (permit amended by Decision of 16 March 2009 Ref. No. SW.II.1.JI.7673-6/08, with respect to the Natural Polyamide Unit), amended in its entirety by Decision by the Marshal of the Kraków Province dated 1 December 2010 Ref. No. SW.II.1.AJ.7673-11/08 (permit amended by Decision of 29 July 2011 Ref. No. SR-II-1.7222.1.2.2011, Decision of 16 February 2012 Ref. No. SR-II-1.7222.1.2.2012, and Decision of 20 June 2012 Ref. No. SR-II-1.7222.1.5.2012), Decision of 21 October 2013 Ref. No. SR-II-1.7222.1.3.2013, Decision of 3 December 2014 Ref. No. SR-II-1.7222.2.16.2014, Decision of 23 January 2018 Ref. No. SR.II.7222.2.12.2017, Decision of 17 August 2020 Ref. No. SR-II.7222.1.28.2018.AJ, and Decision of 10 December 2020 Ref. No. SR-II.7222.2.24.2019.AJ, valid for an indefinite term; • Decision by the Marshal of the Kraków Province dated 28 June 2018 Ref. No. SR-II.7222.13.4.2016, granting an integrated (IPPC) permit to Grupa Azoty S.A. for its Iron-Chromium Catalyst Plant II, valid for an indefinite term; • Decision by the Marshal of the Kraków Province dated 6 June 2022 Ref. No. SR-II-1.7222.1.8.2021.AnJ, granting an integrated (IPPC) permit for a Humic Acid Plant, valid for an indefinite term; • Decision by the Marshal of the Kraków Province dated 1 July 2015 Ref. No. SR-IV-1.7222.1.2015 MG, granting an integrated (IPPC) permit to Grupa 							

Azoty S.A. for the Central Wastewater Treatment Plant, (amended by Decision of 20 April 2018 Ref. No. SR-II.7222.1.7.2018.MM, Decision of 24 June 2020 Ref. No. SR-II.7222.2.17.2019.WM, and [Decision of 12 April 2023 Ref. No. SR-II.7222.2.6.2022.WM](#)), valid for an indefinite term;

Air emissions

- Decision by the Governor of the Kraków Province dated 12 September 2022 Ref. No. SR-II.7221.1.3.2022.AnJ, granting a permit for the release of gases and particulate matter into the air for a concentrated nitric acid plant operating under the name Concentrated Acid Plant, valid until 11 September 2032;
- Decision by the Governor of the Kraków Province dated 29 December 2014 Ref. No. SR-II-1.7221.2.2014, granting a permit for the release of gases and particulate matter into the air to Grupa Azoty S.A., valid until 28 December 2024;
- Notification of Grupa Azoty S.A.'s EC II CHP Plant Water Treatment Unit and Modified Plastics Facility to the Marshal of the Kraków Province dated 24 November 2014 Ref. No. TB/JK/1034/2014;

EU ETS

- Decision by the Marshal of the Kraków Province dated 28 April 2017 Ref. No. SR-II.7225.1.21.2016, granting permission to participate in the European Union Emissions Trading Scheme for the CHP plant located on the premises of Grupa Azoty S.A., including a Monitoring Plan, amended by Decision by the Marshal of the Kraków Province dated 16 September 2019 Ref. No. SR-II.7225.2.3.2019.AJ, including a Monitoring Plan; Decision by the Marshal of the Kraków Province dated 28 September 2020 Ref. No. SR-II.7225.2.9.2019.AJ, including a Monitoring Plan; Decision by the Marshal of the Kraków Province dated 23 July 2021 Ref. No. SR-II.7225.2.14.2020.OBG, including a Monitoring Plan and a Sampling Plan; Decision by the Marshal of the Kraków Province dated 22 March 2022 Ref. No. SR-II.7225.2.21.2021.OBG, including a Monitoring Plan, as well as [Decision by the Marshal of the Kraków Province dated 13 April 2023 Ref. No. SR-II.7225.2.4.2023.AnJ, including a Monitoring Plan, valid for an indefinite term](#);
- Decision by the Marshal of the Kraków Province dated 2 April 2020 Ref. No. SR-II.7225.6.2.2019.AJ, approving the Monitoring Methodology Plan for the CHP plant, amended by Decision by the Marshal of the Kraków Province dated 22 June 2022 Ref. No SR-II.7225.6.12.2021.AnJ, and [Decision by the Marshal of the Kraków Province dated 5 October 2023 Ref. No. SR-II.7225.6.3.2023.AnJ, including a Monitoring Methodology Plan](#);
- Decision by the Marshal of the Kraków Province dated 24 November 2017 Ref. No. SR-II.7225.1.7.2016, granting permission to participate in the European Union Emissions Trading Scheme with respect to greenhouse gas emissions from the units manufacturing nitric acid, ammonia and bulk organic chemicals by way of cracking, reforming, oxidation or similar processes, with a daily production capacity of over 100 Mg, including a Monitoring Plan, amended by Decision by the Marshal of the Kraków Province dated 13 June 2019 Ref. No. SR-II.7225.3.12.2018.AJ, including a Monitoring Plan, and amended by Decision by the Marshal of the Kraków Province dated 18 January 2021 Ref. No. SR-II.7225.2.3.2020.AJ, including a Monitoring Plan, Decision by the Marshal of the Kraków Province dated 22 September 2021 Ref. No. SR-II.7225.2.7.2021.OBG, including a Monitoring Plan, and Decision by the Marshal of the Kraków Province dated 21 December 2021 Ref. No. SR-II.7225.2.11.2021.OBG, including a Monitoring Plan, valid for an indefinite term, and [Decision by the Marshal of the Kraków Province dated 21 April 2023 Ref. No. SR-II.7225.2.6.2022.OBG, valid for an indefinite period](#);
- Decision by the Marshal of the Kraków Province dated 15 December 2021 Ref. No. SR-II.7225.6.9.2021.OBG, approving the Monitoring Methodology Plan for the Production Units (previous versions: SR-II.7225.6.4.2020.OG of 20 April 2021 approving the Monitoring Methodology Plan with annexes; SR-II.7225.6.3.2019.AJ of 2 April 2020 approving the Monitoring Methodology Plan).

Water and wastewater

- Decision by the Mayor of Tarnów dated 13 January 2003 Ref. No. WGK.B-III.6210/16/02/03, granting a permit for collective water supply and collective wastewater discharge, valid for an indefinite term;
 - Decision by the Governor of the Kraków Province dated 30 December 2014 Ref. No. SR-IV-1.7322.1.28.2014.MG, granting a permit for special use of water - abstraction of groundwater from an intake point located in Tarnów-Mościce, valid until 31 December 2034;
 - Decision by the Governor of the Kraków Province dated 29 December 2005 Ref. No. ŚR.XIV.MGa.6811-31-05, granting a permit for special use of water - abstraction of surface water from the Dunajec river, valid until 31 December 2025, amended by Decision Ref. No. KR.RUZ.4211.180.2018.IT dated 16 November 2018;
 - [Decision by the Regional Water Management Authority of Kraków dated 6 July 2023 Ref. No. KR.RUZ.4210.148.2023AiM, granting a permit for discharge of wastewater containing substances particularly harmful to the water environment into the sewerage system of Zakład Oczyszczania Ścieków T.W. Sp. z o.o., valid until 6 July 2027;](#)
 - Decision by the Regional Water Management Authority of Kraków dated 1 July 2019 Ref. No. KR.RUZ.421.1.102.2019.AS, granting a permit for discharge of wastewater containing substances particularly harmful to the water environment into the sewerage system of Zakład Oczyszczania Ścieków T.W. Sp. z o.o., valid until 1 July 2023;
 - Decision by the Regional Water Management Authority of Kraków dated 22 December 2021 Ref. No. KR.RUZ.4210.210.2021.AM, granting a permit for discharge of wastewater into surface waters, valid until 31 December 2025;
 - Decision Ref. No. SR-IV.1.7328.1.2013.MG, establishing a protected zone for water intake points;
- Waste
- Decision by the Marshal of the Kraków Province dated 14 January 2022 Ref. No. SR-III.7244.1.41.2020.AG, permitting Grupa Azoty S.A. to collect waste, valid until 13 January 2032;
- Other
- Resolution of the Provincial Assembly of the Kraków Province of 25 October 2010, No. LI/833/10, establishing Industrial Zone at ZAT S.A. (Official Journal of the Province of Kraków, No. 580/2010, item 4475).

0.9	<p>Develop and implement a corporate (Grupa Azoty) Stakeholder Engagement Plan (SEP) in line with EBRD PR 10.</p> <p>For any new investment project where an Environmental Impact Assessment (EIA) is required by Polish authorities, publish online a Non-Technical Summary (NTS) of SEP for all projects covered by Annex 1 as defined in the EIA directive</p> <p>Ensure that the EIA process is carried out in accordance with EU and Polish requirements.</p>	<p>The corporate (and site-specific) SEP will outline the Company's public communication policy and commitments, including the grievance mechanism, indication of contact persons and project information availability.</p>	Best practice, EBRD PRs		2013–2016; thereafter to be reviewed every two years as part of EHS audits	<p>SEP to be amended/updated every three years or earlier, as needed.</p> <p>Please provide a copy of the NTS (link to web site) in the annual report and as a summary of SEP associated with the EIA process.</p>	<p>NTS is to be a separate document in accordance with the Environmental Impact Assessment directive (“EIA directive”), and include information on the project, impacts and risk mitigation actions, presented in a concise and meaningful way.</p>
<p>Information: On its website, Grupa Azoty regularly publishes its Integrated Report, addressing a range of aspects, including safety and environmental protection (for the most recent report, go to https://raport2022.grupaazoty.com/)</p>							
0.10	<p>Regular ESHS audits (every three years) to review the progress in ESAP implementation and status of compliance with EU environmental standards. The first report will be part of BAT assessment.</p>	Review status of operations	Best practice	As part of BAT assessment in 2015	Report for the Management Board and EBRD	Report for the Bank as part of 2016 report	

<p>Information: In line with the Strategy, the Company focuses on consistent alignment of product quality and range to customer requirements, product improvement with the use of innovative technologies, and reduction of product costs through modernisation of key production lines. To ensure lasting and effective customer relations and become the first-choice supplier, the Company makes every effort to offer top quality products. The pursuit of strategic objectives is based on management systems consistent with the highest international standards. Also, pursuant to environmental protection laws, the Company holds valid integrated (IPPC) permits to operate all its production units, which define the Company's obligations under applicable laws. BAT assessments for individual units were made in the applications for amendments to the integrated (IPPC) permits for existing IPPC installations and will be made in the applications for integrated (IPPC) permits for new installations. The analysis confirmed compliance of Grupa Azoty S.A.'s existing installations with BAT. For information on EHS audits, see Section 1.1.</p>							
0.11	Develop contaminated land management plan - this should include identification and cataloguing of contaminated sites, control measures and remediation plan.	Compliance with the regulations and remediation programmes.	Legislative requirement	As soon as possible	Soil or groundwater surveys or monitoring results	Regular monitoring results for each contaminated site. Identification should cover areas around production plants.	
<p>Information: Grupa Azoty S.A. carried out surveys to find out if there are any contaminated areas within its premises. The surveys enabled the Company to make a catalogue of contaminated sites. Local soil contamination with mercury was discovered at the site of the inactive Mercury Electrolysis Plant - the site was remediated. No contamination of groundwater was detected. In 2015, a Baseline Report was prepared covering the Company's premises, which is submitted to the Marshal Office together with applications for integrated permits. In accordance with the integrated (IPPC) permits, a systematic soil and groundwater contamination risk assessment is conducted every year for facilities covered by the permits.</p>							
1. Site Specific Environmental, Health and Safety Management System							
No.	Action	Environmental risks, liabilities/benefits	Legislative requirements/Best practice	Requirement/Resources	Scheduled completion - action to be completed by end of year	Target and evaluation criteria for implementation progress	Comments

1.1	Introduce newly developed Environmental, Health and Safety Management Systems at all Grupa Azoty production plants.	In order to maintain comprehensive management systems at the Company, it is necessary to implement the newly developed EHS systems at all production plants. Maintaining effective and comprehensive environmental and social management systems is the best way to ensure a dynamic and continuous improvement of EHS performance at the Company. It allows the organisation to identify, avoid, minimise and mitigate potential EHS risks and impacts. The EHS management system must cover activities undertaken by contractors and other third parties (plant engineering and maintenance staff) as well as other plant staff. The system should include an EHS training programme for all employees and contractors.	Compliance with EBRD and PR 1. Compliance with standards of the leading companies (ZA Tarnów and ZA Puławy).	Management time or consultant fees	In the course of 2013-2014	EHS management system has a clear structure defining responsibilities and formalised operating procedures.	Cover each plant with the existing EHS management systems
<p>Information: On a site-specific basis, i.e., Grupa Azoty S.A.</p> <p>Grupa Azoty has implemented the Integrated Management System based on international standards and structured around the principles of giving priority to customers, reducing environmental losses and mitigating the risk of hazards, as well as continuous improvement.</p> <p>The Parent has implemented:</p> <ul style="list-style-type: none"> • Quality Management System compliant with ISO 9001:2015, • Environmental Management System compliant with ISO 14001:2015, • Energy Management System compliant with ISO 50001:2018, • Occupational Health and Safety Management System compliant with ISO 45001:2018, • Food Safety Management System compliant with ISO 22000:2018, 							

- PN-EN ISO/IEC 17025:2018 Management System (general requirements for the competence of testing and calibration laboratories),
- Management Standard compliant with the Fertilizers Europe Product Stewardship Standard,
- Information security management system ISO/IEC 27001:2013,
- System International Sustainability & Carbon Certification Plus (ISCC PLUS).

The implemented systems are continually improved. The Company takes improvement measures addressing, among other things, various issues that determine an improvement in the EHS area. The Company has implemented a procedure for identification of environmental aspects and selection of material aspects. Another procedure in place at the Company is the Environmental Monitoring and Compliance Obligations. The following procedures apply with respect to OHS management: the Occupational Risk Management, the Monitoring of Occupational Health and Safety and the Compliance Obligations. These tools describe the rules of identifying, assessing and managing environmental and OHS issues with a view to minimising related risks. The procedures and other internal regulations adopted by the Company take into account the activities of employees, contractors and other third parties, as well as their training.

1.2	<p>Provide annual reports on EHS performance to EBRD and other shareholders.</p> <p>A general (brief) summary of environmental and social matters to be provided on the website.</p> <p>For every new project that requires an EIA under Polish law and is subject to Annex 1 to the EIA directive, a Non-Technical Summary (NTS) to be provided on the Internet.</p>	<p>Aspects to be included in the annual report:</p> <ul style="list-style-type: none"> – general information on the project status within the Group; – information on the overall environmental performance and compliance; – summary of KPIs covering energy intensity and carbon dioxide emissions for each subdivision; – summary of any areas of material non-compliance with environmental regulations, or material breach of the relevant permit levels; – information on any material fines or other material penalties or pending prosecutions related to ESHS matters; – general information on ESAP implementation; – summary of any material legislative changes related to environmental or social aspects. 	Best practice/compliance with EBRD PRs	Internal resources	<p>Annually, published in the first quarter of a year</p> <p>First report in 2014.</p>	Expand existing shareholder reporting system.	<p>Provide annual reports on Environmental, Social, Health and Safety (ESHS) performance to the EBRD and other shareholders.</p> <p>A general (brief) summary of environmental and social matters to be provided on the website.</p>
<p>Information: The EHS report was prepared in 2023. EHS information is included in the report for EBRD and in the account of ESAP implementation. Grupa Azoty was working to prepare its integrated report for 2022. The report is drawn up in accordance with the Global Reporting Initiative Standards and will be subject to external audits. The GRI report will be available on the Company's website. Non-Technical Summaries concerning new implemented projects requiring an EIA are posted on the Grupa Azoty website.</p>							

1.3	Set up a procedure to process complaints and grievances to enable meaningful public consultation and information process, in particular with regard to historical environmental impact (e.g., the Wiślinka landfill site in Gdańsk). The potential environmental and social risks are treated as a significant issue requiring much attention.	Early identification of problems and public grievances to ensure timely implementation of solutions.	Best practice and compliance with EBRD and PR 10 requirements.	Operational costs of information office.	Ongoing	Management reports on application of the grievance procedure	Set up a procedure to process complaints and grievances to enable meaningful public consultation and information process
Information: Grupa Azoty S.A. has developed and implemented a procedure for handling complaints and grievances in the form of Instruction No. I-705/4.							
2. Actions required to maintain compliance with EHS requirements of national law and EU environmental standards - GRUPA AZOTY S.A.							
No.	Action	Environmental risks, liabilities/benefits	Legislative requirements/Best practice	Requirement/Resources	Scheduled completion - action to be completed by end of year	Target and evaluation criteria for implementation progress	Comments
2.1	Monitoring of environmental impacts of all operated production facilities. Reference to BAT requirements.	Record consumption of raw materials, fuels and energy, air emissions, water consumption, and amounts of generated waste Regularly evaluate operational efficiency to minimise resource consumption and waste generation.	Legislative obligation, best practice/internal resources	Internal resources	Ongoing/ad-hoc and periodic reports	Statement of compliance in the annual report	Achieve environmental impact level in line with the design, environmental guarantees and standards, identify potential improvements. Submit report to the Bank.

	<p>Information: The Company records consumption of raw materials, fuels and energy, air emissions, water consumption, and amounts of generated waste. Data describing the scale of environmental impacts is entered in the Company's Environmental Pollution Data Bank. This IT system is used to prepare Reports for the Marshal Office of Kraków and ad-hoc reports for the Company's internal needs and for external institutions. Furthermore, reports are prepared for the National Database on Emissions of Greenhouse Gases and Other Substances, the National Pollution Release and Transfer Register, the Central Register of Operators (CRO) and the Waste Database (BDO). As part of reviews of the integrated (IPPC) permits held by Grupa Azoty S.A., the Company's compliance with BAT requirements is assessed. In 2023, an assessment was performed to check the conformity of the Company's environmental impacts with the integrated (IPPC) permits held.</p>						
2.2	Complete planned investment projects, such as the Sulfuric Acid Plant upgrade, to maintain compliance with BAT.	The Sulfuric Acid Plant is being upgraded and the project will help maintain BAT compliance	Best practice Legal requirements /BAT	Internal resources	Ongoing/ad-hoc and periodic reports	Provide update on BAT compliance as part of 2015 BAT assessment	
	<p>Information: The upgrade of the Sulfuric Acid Plant was completed in December 2013. The purpose of the project was to achieve improved environmental performance and increased steam output, while ensuring BAT compliance. Capital expenditure on the project totalled PLN 64,648 thousand.</p>						
2.3	<p>Complete the planned modernisation of energy generation installations to ensure compliance post 2016. The action will require application of relevant derogations agreed upon with Polish and EU authorities.</p> <p>Target emission levels: 200 mg/m³ for SO₂ 200 mg/m³ for NO_x 20 mg/m³ for PM.</p> <p>The Company to provide information on the derogations and their relevance to the annual report.</p>	<p>Reduce environmental impact in line with IED requirements (Annex V of IED). The investment project will include a deNO_x unit, an FGD unit, and a more efficient particulates extraction system, in connection with BAT requirements.</p> <p>As part of the energy audit and BAT assessment, other carbon reduction measures will be considered.</p>	Legislative requirements, best management practices, Bank's PRs	Investment needs	By 2016/2017	<p>Obtain a relevant permit</p> <p>Update information on the project in the annual report, selected technology and target emission levels.</p> <p>Publish NTS of the project and provide copy/web link to the Bank as part of the annual report.</p>	

	<p>Information: In 2017, the construction of flue gas NOx removal and desulfurisation systems at GA S.A. was completed. The projects were undertaken to ensure compliance of the Company's industrial combustion sources with the requirements laid down in the Minister of Environment's Regulation on emission standards for installations of 22 April 2011 and the Industrial Emissions Directive. As a result, the amount of pollutants released into the environment by the combustion sources has been reduced, improving air quality. The projects were co-financed under the Norwegian Financial Mechanism 2009-2014. Capital expenditure on the flue gas desulfurisation and particulates extraction project totalled PLN 44,800 thousand, and capital expenditure on the flue gas deNOX project totalled PLN 44,498 thousand.</p> <p>In 2019, GA S.A. initiated projects designed to bring the Company's heat and power generation activities in line with the more stringent environmental requirements arising from BAT conclusions (Commission Implementing Decision 2017/1442/EU of 31 July 2017 establishing best available techniques (BAT) for large combustion plants). The projects were completed and commissioned in 2023. They included adjustment of the FGD absorption unit on the K5 boiler to the requirements of BAT conclusions and upgrade of the K1 gas-fired boiler to secure a peak-load/reserve source for Grupa Azoty S.A. that would meet the emission requirements arising from BAT conclusions. In 2023, capital expenditure on those projects totalled PLN 2,820 thousand.</p>						
2.4.	Prepare a plan (including budget) and - if necessary - upgrade the wastewater treatment plant to ensure long-term compliance with Polish and EU environmental standards	Reduce environmental impact and ensure compliance with IED requirements.	Legislative requirements, best management practices, Bank's PRs	Investment needs, internal and external	2015 - 2020 as required by competent authorities	Obtain integrated (IPPC) permit and achieve compliance	Information on the progress status should be provided in annual reports starting from 2015
	<p>Information: Grupa Azoty prepared an upgrade plan for its wastewater treatment plant. Possible time of implementation of the project has been defined as 2026-2028.</p> <p>Due to changes in the composition and volume of wastewater in recent years, in 2021 the Company completed the construction of a pilot-plant unit for biological treatment of wastewater. The unit enables tests to be carried out on a pilot-plant scale on industrial wastewater streams discharged from Grupa Azoty S.A.'s production lines in Tarnów, consisting in simulation of biological wastewater treatment in various process configurations, under near real-life conditions. The purpose of the tests is to optimise the processes at the biological wastewater treatment plant (BOŚ) currently in operation, in order to improve the efficiency of nitrogen removal and to select process configurations and technical and process parameters for the upgrade of BOŚ. After the tests, the upgrade plan is to be updated in order to, among others, further optimise the work scope and update the potential project schedule.</p>						
2.5	Prepare a plan (including budget) and conduct soil and groundwater surveys.	Reduce negative environmental impact in line with IED requirements. This will enable an assessment of baseline conditions and identification of potential impact receptors.	Legislative requirements, best management practices, Bank's PRs	Internal resources and external support	2015 - 2018	Report on soil and groundwater condition	

Information:

In 2015, a Baseline Report was prepared covering the Company's premises, which was submitted in 2016 to the Marshal of the Kraków Province. In accordance with the integrated (IPPC) permits, a systematic soil and groundwater contamination risk assessment is conducted every year for facilities covered by the permits.

1. Information about the Company	
Company Name: Grupa Azoty Zakłady Chemiczne Police S.A.	
Company Address: ul. Kuźnicka 1, 72-010 Police	
Country: Poland, Szczecin Province	
Town/Location: Police	
Company authorised representative: I certify that the data contained in this report completely and accurately represents the Company's operations during the reporting period. Signature: Jarosław Konopacki Title: Head of Plant Safety Department Date: 30 April 2024	
Contact Details: Telephone: (+48) 91 317 13 68; Mobile: (+ 48) 887 744 415 Email: Jaroslaw.Konopacki@grupaaazoty.com	

Please provide key data on the Company performance, as well as production levels at each plant. For each of the 7 large plants please provide:
Key performance indicators in terms of energy consumption, emissions, use of natural resources, and carbon dioxide emissions;

Item (PLN '000)	Cumulative	
	2022 performance	2023 performance
*Revenue	5,310,926	2,938,895
Profit/(loss) on sales	96,640	(267,477)
EBIT	-148,484	(338,671)
EBITDA	226,740	(59,304)
Net profit/(loss)	-91,992	(1,206,307)

Number of staff employed and any change in employment over past 3 years

	As at 31 Dec 2021	As at 31 Dec 2022	As at 31 Dec 2023
Number of direct employees:	2,536	2,533	2,557
Number of contracted workers:	0	0	0

Provide information on permits and each subsidiary's compliance status with IPPC/IED (*Integrated Pollution Prevention and Control Directive/Industrial Emissions Directive*)

Reporting period: 2023

Grupa Azoty Zakłady Chemiczne Police S.A. monitors changes in environmental protection regulations on an ongoing basis and takes measures to ensure continuous compliance. The Company takes part in public consultations announced by competent public administration authorities, voicing its comments on draft legislation.

In accordance with the integrated permit, the Company fulfils the obligation to assess the risk of soil, land and groundwater contamination with substances used in technological processes. The assessment takes into account the technical and organisational measures, as well as measures taken to prevent soil, land and groundwater contamination.

INTEGRATED PERMIT

Grupa Azoty Zakłady Chemiczne Police S.A.'s production and auxiliary units are operated based on the integrated (IPPC) permit issued by way of a decision of the Marshal of the Szczecin Province dated 9 January 2014. The permit was issued for an indefinite period.

In 2023, the Company obtained a single decision amending the integrated (IPPC) permit.

The amendment concerned Section 1.4.1.1 'Description of the installation and technology', which relates to the production of titanium white.

In addition, the amendment required the insertion of new provisions:

- in Appendix 1 (Increase in annual emissions of sulfur dioxide from 318.2 Mg/year to 348.3 Mg/year, and of particulate matter from 167.6 Mg/ year to 172.9 Mg/year),
- in Appendices 2 and 3, in connection with adjustments to the operating time of E3-1, E3-2, E3-3, E3-4, E3-7, E3-1 and E3-8 emitters, and changes of gas velocity in E3-8, E3-12 emitters.

For E3-7 and E3-26 emitters, the changes relate to an increase in gas outlet temperatures from 343K to 393K and from 293K to 313K.

- Decommissioning of E3-10 Raymond Mill No. 3 emitter - venting of the mill body and silos.
- Expansion of the finished product unit to include new storage silos and one loading module for road tankers, as well as establishment of new emitters E3-44 ABO-8 Silo, E3-45 ABO-9 Silo, and E3-46 ABO-10 Silo.
- Amendment of the description of E6-31 emitter at PN2 packing facility, to which two storage containers had been connected: F701 D F701E. Now, the F701 container has been retired and replaced with 301 B container.

With respect to water and wastewater management - deletion of the redundant provision specifying when the obligation to monitor abstracted water arises: “no later than 8 June 2020” (effective date of the IPPC permit provisions resulting from Commission Implementing Decision (EU) 2016/902 establishing best available techniques (BAT) conclusions for the common waste water and waste gas treatment/management systems in the chemical sector, in accordance with Directive 2010/75/EU of the European Parliament and of the Council).

The decision does not refer to the provision concerning removal of ammoniacal nitrogen from among the parameters monitored in treated wastewater. The Polish National Water Agency (PGW Wody Polskie) did not agree to the amendment, arguing that, among other things, the water body of the TW60001WB2 Szczecin Lagoon transitional waters had not yet achieved the required environmental target with respect to ammoniacal nitrogen levels.

On 26 June 2023, an application was submitted to the Marshal Office of the Szczecin Province to amend the integrated (IPPC) permit with regard to:

- utilisation of hydrogen from the PDH unit in the ammonia production unit and transmission of hydrogen from the ammonia unit to start the PDH unit;
- retirement from service of the Demi 1 station, pursuant to Resolution No. 898/IX/23 of the Management Board of Grupa Azoty Zakłady Chemiczne Police S.A.;
- possibility of producing process calcium sulfate (VI) as a semi-finished product of the PF2 phosphoric acid plant, to be used mainly for the manufacture of compound fertilizers as a sulfur and calcium carrier, thus reducing the mass of phosphogypsum directed to the phosphogypsum landfill site.

On 15 February 2024, an administrative decision was issued granting the Company's request for these amendments.

2. General information		
Is the project materially compliant with all relevant EBRD Performance Requirements (taking account of agreed action plans, exemptions or derogations)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	If NO, please provide details of any material non-compliances:
Is the project materially compliant with all applicable environmental and social laws and regulations?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	If NO, please provide details of any material non-compliances:
Have there been any accidents or incidents that have caused damage to the environment, brought about injuries or fatalities, affected project labour or local communities, affected cultural property, or created liabilities for the company?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	If YES, please describe, including details of actions to remedy and prevent reoccurrence:

<p>Have there been any changes to environment, social, labour or health and safety laws or regulations that have materially affected the Company?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p><u>With respect to health and safety:</u></p> <p>The state of epidemic emergency declared in connection with the SARS-CoV-2 virus was revoked by Regulation of the Polish Minister of Health as of 1 July. (<u>Regulation of the Minister of Health of 14 June 2023 on the revocation of the state of epidemic emergency in the Republic of Poland</u>).</p> <p>Amendments to the Regulation on work with display screen equipment</p> <p>Regulation of the Polish Minister of Family and Social Policy of 18 October 2023 amending the Regulation concerning safety and health requirements for workstations with display screen equipment (Dz.U. item 2367)</p> <p>Key amendments to the Regulation</p> <ul style="list-style-type: none"> ✓ In accordance with the amended wording of the Regulation, the term workstation should be understood as the workspace together with: ✓ a basic assembly comprising display screen equipment, a keyboard, mouse or other input devices, software determining the operator/machine interface; ✓ chair and work desk; ✓ optional accessories, peripherals including the disk drive, printer, document holder and footrest. ✓ The amendments included deletion of Section 2.3 of the Regulation, containing the definition of a computer system. ✓ At the same time, the provision of Section 3.4 was clarified by indicating that the Regulation does not apply to portable systems not intended for use at a workstation for at least half of the daily working time. ✓ A significant amendment was also made to Section 8.2 of the Regulation by supplementing this provision with the employer's obligation to provide workers not only with glasses, but also corrective contact lenses.
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<p>How many inspections did you receive from the environmental authorities during the reporting period?</p>	<p>Number: 2</p>	<p>Please provide details of such inspections, including the number and nature of any violations found:</p> <p>On 19 January 2023 - 6 February 2023, the Provincial Inspectorate for Environmental Protection of Szczecin carried out an emergency inspection at the Company. The inspection was made after high SO₂ concentrations were recorded by the automatic monitoring station at Piłsudskiego Street in Szczecin on 18 January 2023. In order to identify the potential sources of SO₂ emissions, inspections were conducted at several industrial plants, including GA POLICE S.A.</p> <p>The inspection found two violations:</p> <ol style="list-style-type: none"> 1. Operation of the FGD unit in breach of the terms of the integrated (IPPC) permit by exceeding the permitted daily average NO_x concentration limits at E7-2 emitter of the EC II CHP plant in January 2023. 2. Non-compliance with the obligation to continuously measure SO₂, NO_x and PM air emissions on the old ducts of E7-2 emitter of the EC II CHP plant in January 2023. <p>Two employees of the EC II CHP plant were punished with fines for those violations.</p> <p>On 9 November 2023 - 4 December 2023, the Provincial Inspectorate for Environmental Protection of Szczecin carried out an inspection covering the ammonia loading/unloading facility on the Mijanka wharf; documentation concerning compliance with the obligations imposed on upper-tier establishments and prevention of major industrial accidents; sulfur content in heavy fuel oil; fulfilment of the obligation to submit reports on the use of the environment, including a report to be filed with the National Centre for Emissions Balancing and Management (KOBiZE) for 2022. No violations were found in the course of the inspection and no penalties were imposed.</p> <p>In 2023, administrative proceedings were initiated and an administrative fine of PLN 2,316,410 was imposed for exceeding the SO₂, NO_x and PM emission limits from the E7-2 emitter of the EC II CHP plant in 2020. Pursuant to Art. 318 and Art. 319 of the Environmental Protection Law, on 15 January 2024 the Company applied to the Provincial Inspectorate for Environmental Protection (WIOŚ) of Szczecin to reduce and cancel the fines for excessive emissions of SO₂ (PLN 901,864.23) and particulate matter (PLN 28,546.11) by offsetting them against the value of completed projects at the FGD unit and electrostatic precipitators, and to defer the payment date of the fine for excessive NO_x emissions (PLN 1,385,999.79).</p>
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<p>How many inspections did you receive from the health and safety authorities during the reporting period?</p>	<p>Number: 2</p>	<p>Please provide details of such inspections, including the number and nature of any violations found:</p> <p>Inspections by the State Sanitary Inspectorate:</p> <p>1) authorisation Ref. No. PPIS.057.1.1165.2023 Date: 5 September 2023 - 8 September 2023 Emergency inspection held after a report was received of lack of appropriate hygienic and sanitary conditions at workers' toilets in PN3 building No. 519 at the NPK II Department. IMPLEMENTED</p> <p>2) authorisation Ref. No. PPIS.057.1.1525.2023 Date: 4 December 2023 - 20 December 2023 Assessment of the working environment, including the employer's compliance with the legal requirement to maintain appropriate sanitary and technical conditions. ONGOING</p> <p>Inspections by the State Fire Service: In 2023, no external inspections were carried out on orders from the Police County Commander-in-Chief of the State Fire Service or Szczecin Province Commander-in-Chief of the State Fire Service.</p>
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<p>How many inspections did you receive from the labour authorities during the reporting period?</p>	<p>Number: 2</p>	<p>Please provide details of such inspections, including the number and nature of any violations found:</p> <p>Inspections by the <u>National Labour Inspectorate</u>: Letter Ref. No. 140280- 53 -K006-Nk01/23 of 2023 <u>Date</u>: 7 December 2022 - 7 February 2023 <u>Scope</u>: Checking the implementation of legal remedies issued in the course of earlier inspections and compliance with selected health and safety regulations. The National Labour Inspectorate issued 16 compliance orders, 14 have been implemented, 2 are ongoing, due for implementation by the end of 2024. Letter Ref. No.: 140280-53-K060-Nk01/23</p> <p><u>Date</u>: 30 November 2023 <u>Scope</u>: 3 compliance orders 1. Update the occupational risk assessment for the workstations of remote workers to include the workstation description, covering machinery, tools and materials used, and tasks performed. ONGOING. 2. Identify sources of emissions of chemical agents, including carcinogenic or mutagenic chemicals in the work environment of a laboratory sample taker, to select them for testing and measurements. ONGOING. 3. Provide a health and safety manual with guidelines on proper maintenance of air conditioning and ventilation equipment and systems in JPA II laboratory rooms of the Quality Control Department. ONGOING.</p>
<p>Have these visits resulted in any penalties, fines and/or corrective action plans?</p>	<p>Yes [] No [X]</p>	<p>If YES, please describe, including status of implementing corrective actions to address any violations found:</p>

<p>Has the Company engaged any contractors for project-related work in the reporting period?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>If YES, please state for which types of work, and how the Company has monitored the compliance of contractors with EBRD Performance Requirements and the Environmental and Social Action Plan:</p> <p>Contractors were engaged, <i>inter alia</i>, for:</p> <ul style="list-style-type: none"> - Taking samples and measuring concentrations of soluble forms of heavy metals: zinc, lead, nickel, chromium and antimony in water from the piezometers of the monitoring network of the iron sulfate landfill site. The contractor holds accreditation No. AB 283 from the Polish Centre for Accreditation. - Taking geodetic measurements of the landfill sites. The contractor holds the relevant professional licences and certifications required to carry out the work.
<p>Were any of the violations stated above the responsibility of contractors?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>If YES, please provide details, including how the Company is ensuring that corrective actions are implemented by the contractor?</p>
<p>Have any operations been reduced, temporarily suspended or closed down due to environmental, health, safety or labour reasons?</p>	<p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>	<p>If YES, please describe:</p>

Please describe any environment or social programmes, initiatives or sub-projects undertaken during the reporting period to improve the Company's environmental or social performance and/or management systems:

OHS area:

1. Health and safety at work improvement measures were set out in the 'Working conditions improvement plan 2023', and included refurbishment of offices and staff amenities, purchase of additional office equipment, as well as improvement of the technical condition of, and provision of access routes to, machinery and equipment. 15 projects worth a total of **PLN 508,855.76** were implemented.
2. In recognition of its commitment to ensuring safety, the Company received awards, including the Gold Card of Safe Work Leader (*Złota Karta Lidera Bezpiecznej Pracy*).
3. In 2023, the Company continued to operate programmes aimed at improving safety at work, including:
 - Regular safety briefings with rank-and-file staff, based on '5 minutes for safety' instruction materials developed by the OHS and Accident Prevention Office,
 - Quarterly safety meetings held to engage management in OHS matters.
4. Under the BSC programme, the Company also monitors and updates its occupational and environmental safety indicators.

In order to improve Grupa Azoty Zakłady Chemiczne Police S.A.'s environmental and social performance, the following projects were carried out in 2023:

- **Making production of demineralised water independent of variable salinity of the Oder River and increasing the capacity to produce special waters in water preparation units** (project budget: PLN 111,000 thousand; 2023 expenditure: PLN 1,302 thousand). The objective was to safeguard Grupa Azoty Zakłady Chemiczne Police S.A. against periodic increases in salinity of the Oder River and to enable the Company to use water from the river as the sole source of water treated for special applications.
- **Replacement of absorption tower WA I with a new absorption tower on Line 3** - (project budget: PLN 33,000 thousand; 2023 expenditure: PLN 1,352 thousand). The purpose of the investment is to maintain the uninterrupted operation of the sulfuric acid and steam production unit and to

avoid a major accident which could result in environmental contamination (leakage of sulfuric acid into soil).

- **Recycling of hydrogen originating from the propylene unit to be used at the ammonia unit** (project budget: PLN 30,000 thousand; 2023 expenditure: PLN 508 thousand). The objective of the investment is to reduce the consumption of natural gas for ammonia production and thus minimise carbon dioxide emissions.
- **Construction of facilities and infrastructure for the processing and treatment of iron sulfate** - (budget: PLN 11,000; 2023 expenditure: PLN 301 thousand). The project will significantly reduce the volumes of landfilled waste through commercial use of the waste.
- **Industrial noise reduction for Grupa Azoty Zakłady Chemiczne Police S.A.** - (budget: PLN 2,160 thousand; 2023 expenditure: PLN 399 thousand). The project has to be implemented to fulfil Grupa Azoty Zakłady Chemiczne Police S.A.'s obligations and commitments under the Environmental Protection Law of 27 April 2001 and Regulation of the Minister of Environment of 14 June 2007 on permissible noise levels.
- **Construction of industrial sewage system connection between road 1 and road 2** (budget: PLN 5,900 thousand; 2023 expenditure: PLN 3,041 thousand). The purpose of the project is to evenly distribute wastewater loads between combined sewers, which will eliminate potential spills outside the sewage system.
- **Roof replacement on facility No. 363 - removal of asbestos** - (project budget: PLN 680 thousand; 2023 expenditure: PLN 48 thousand). The project has been undertaken in view of the need to remove Eternit roofing panels to comply with the applicable laws requiring that all products containing asbestos must be removed from buildings and other structures. The project was completed in 2023.
- **Replacement of 334X PN-2 scrubber** - (budget: PLN 1,700 thousand; 2023 expenditure: PLN 1,666 thousand). The project will improve the off-gas separation process, translating into a reduction of the amount of pollutants emitted into the atmosphere. The project was completed in 2023.

Please indicate the level of associated expenditure (capital expenditure and operating expenditure), and whether this relates to the requirements of the Environmental and Social Action Plan, or to any other initiative:

In 2023, the total amount of capital expenditure on the above environmental protection projects was PLN 8,617 thousand.

3. Status of the Environmental and Social Action Plan

Please provide information on the status of each item in the Environmental and Social Action Plan (ESAP) agreed with EBRD. If the ESAP was updated during the reporting period, please attach a copy of the new plan.

A copy of the Environmental and Social Action Plan is attached as Appendix 1 to this Report.

4. Environmental Monitoring Data for each of the key subsidiaries

The information required in this section can be extracted from a CSR report, or a full CSR report can be attached.

Please provide the name and contact details for your environmental manager:			Magdalena Rabe Chief Environmental Protection Officer magdalena.rabe@grupazoty.com	
Parameter ²	Amount ³	Unit	Compliance Status ⁴	Comments ⁵
Wastewater				
Treated industrial wastewater	19,690,261.0	m ³ /year	compliant with the integrated permit	
Treated municipal wastewater	1,380,150.0	m ³ /year	compliant with the integrated permit	
Total wastewater	21,070,411.0	m ³ /year	compliant with the integrated permit	
Spent cooling water and stormwater	80,056,063.0	m ³ /year	compliant with the integrated permit	

Biochemical Oxygen Demand (BOD5)	104.68	Mg/year	compliant	
Chemical Oxygen Demand (COD)	307.94	Mg/year	compliant with the integrated permit	
Suspended solids	196.41	Mg/year	compliant with the integrated permit	
Ammoniacal nitrogen	160.85	Mg/year	compliant with the integrated permit	
Total phosphorus	4.22	Mg/year	compliant with the integrated permit	
Total iron	9.09	Mg/year	compliant with the integrated permit	
Fluorides	279.63	Mg/year	compliant with the integrated permit	
Titanium	0.04	Mg/year	compliant with the integrated permit	
Total nitrogen	214.37	Mg/year	compliant with the integrated permit	
Air emissions	Per each major point source			
SO ₂	ammonia production	0.37	Compliant with the integrated permit	
	titanium white production	51.31	Compliant with the integrated permit	
	mineral fertilizers production	0.38	Compliant with the integrated permit	
	sulfuric acid production	2,067.93	Compliant with the integrated permit	
	fuel combustion (capacity above 50 MW)	145.36	Compliant with the integrated permit	
Nitrogen oxides (NO _x)	ammonia production	77.55	Compliant with the integrated permit	
	titanium white production (Fespol)	7.05	Compliant with the integrated permit	
	mineral fertilizers production	4.07	Compliant with the integrated permit	

	sulfuric acid production	86.66	Compliant with the integrated permit	
	fuel combustion (capacity above 50 MW)	298.17	Compliant with the integrated permit	
PM	titanium white production	30.32	Compliant with the integrated permit	
	phosphoric acid production	15.27	Compliant with the integrated permit	
	mineral fertilizers production	41.87	Compliant with the integrated permit	
	urea production	66.54	Compliant with the integrated permit	
	fuel combustion (capacity above 50 MW)	12.36	Compliant with the integrated permit	
CO ₂	ammonia production unit	270,072.550	Actual emissions	
	urea production unit	8,999.940	Actual emissions	
	titanium white production unit	16,374.316	Actual emissions	
	mineral fertilizers production unit	21,324.318	Actual emissions	
	sulfuric acid production unit	1,358.233	Actual emissions	
	dried iron sulfate production unit	2,070.261	Actual emissions	
	EC I (CHP Plant I)	0.0	Actual emissions	
	EC II (CHP Plant II)	516,790.696	Actual emissions	
Other parameters				
Noise emissions	The 2023 environmental noise measurements in acoustically protected areas confirmed that noise emissions were within permitted levels, compliant with the integrated (IPPC) permit. Frequency of measurements (once every two years).			
[Other]				
Solid waste				
Please provide details of the types and amounts of solid wastes generated by the project. Indicate where wastes are classified as hazardous. Indicate the final re-use, recycle or disposal method for each waste type.				

* emission loads determined based on continuous pollutant emissions monitoring.

** emission loads determined in relation to TNP.

Information on waste generated in 2023

Solid waste generated by Grupa Azoty POLICE			
No	Waste code	Waste type	Weight of waste generated [Mg]
1.	06 03 14	Solid salts and solutions other than those mentioned in 06 03 11 and 06 03 13	8.20
2.	06 05 03	Sludges from onsite effluent treatment other than those mentioned in 06 05 02	306,290.00
3.	06 09 81	Phosphogypsum mixed with slag, bottom ash and boiler dust (excluding boiler dust mentioned in 10 01 04)	1,034,455.228
4.	06 11 83	Waste iron sulfate	62,237.49
5.	15 01 02	Plastic packaging	39.9
6.	15 01 03	Wooden packaging	326.525
7.	16 02 13*	Discarded equipment containing hazardous components(5) other than those mentioned in 16 02 09 to 16 02 12	0.06
8.	16 02 14	Discarded equipment other than that mentioned in 16 02 09 to 16 02 13	3.263
9.	16 02 16	Components removed from discarded equipment other than those mentioned in 16 02 15	1.22
10.	16 06 01*	Lead batteries	8.76
11.	17 01 07	Mixture of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06	16.40
12.	17 04 02	Aluminium	10.13
13.	17 04 05	Iron and steel	633.445
14.	17 04 11	Cables other than those mentioned in 17 04 10	2.94
15.	19 09 02	Sludges from water clarification	940.2

Solid waste (generated) managed as part of recovery process at Grupa Azoty POLICE				
No	Waste code	Waste type	Weight [Mg]	Recovery/disposal operation
1.	06 03 14	Solid salts and solutions other than those mentioned in 06 03 11 and 06 03 13	8.2	R5
2.	06 05 03	Sludges from onsite effluent treatment other than those mentioned in 06 05 02	306,290.00	R5

3.	06 11 83	Waste iron sulfate	2,984.18	R5
4.	19 09 02	Sludges from water clarification	940.2	R5
Solid waste (generated) managed as part of disposal process at Grupa Azoty POLICE				
No .	Waste code	Waste type	Weight [Mg]	Recovery/disposal operation
1.	06 09 81	Phosphogypsum mixed with slag, bottom ash and boiler dust (excluding boiler dust mentioned in 10 01 04)	1,034,455.228	D5
2.	06 11 83	Waste iron sulfate	25,794.984	D9
3.	17 01 07	Mixture of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06	16.4	D5
Solid waste (generated) transferred to external operators for recovery (R) or disposal (D)				
No .	Waste code	Waste type	Weight [Mg]	Recovery/disposal operation
1.	06 11 83	Waste iron sulfate	65,078.53	R
2.	15 01 02	Plastic packaging	39.9	R
3.	15 01 03	Wooden packaging	313.335	R
4.	16 02 13*	Discarded equipment containing hazardous components(5) other than those mentioned in 16 02 09 to 16 02 12	0.06	D
5.	16 02 14	Discarded equipment other than that mentioned in 16 02 09 to 16 02 13	3.263	R
6.	16 06 01*	Lead batteries	8.87	R
7.	17 04 02	Aluminium	9.6	R
8.	17 04 05	Iron and steel	645.152	R
9.	17 04 11	Cables other than those mentioned in 17 04 10	2.94	R
Solid waste collected from external operators for management as part of recovery (R) or disposal (D) processes at Grupa Azoty POLICE				
No .	Waste code	Waste type	Weight [Mg]	Recovery/disposal operation
1.	12 01 01	Ferrous metal filings and turnings	368.103	R4
2.	17 01 01	Concrete waste and rubble from demolition and repair	107.66	D5
3.	17 01 02	Brick rubble	7.74	R5
			8.28	D5

4.	17 01 07	Mixture of concrete, bricks, tiles and ceramics other than those mentioned in 17 01 06	113.88	R5
			16.04	D5
5.	17 02 02	Glass	0.36	D5
6.	17 05 04	Soil and stones other than those mentioned in 17 05 03	1,821.62	R5
7.	17 06 04	Insulation materials other than those mentioned in 17 06 01 and 17 06 03	67.74	D5

* -hazardous waste

5. Resource Usage and Product Output			
Parameter	Amount	Measurement Unit	Comments
Fuels used			
Crude oil	Not applicable	-	
Natural gas	2,783,962	MWh	
Hard coal	238,480.728	Mg	
Lignite	Not applicable	-	
Grid electricity	257,588.926	MWh	
Heat purchased from external sources	464,682	GJ	
Feedstocks and raw materials used			
Phosphate rock	454,723.560	Mg	
Sulfur	104,379.546	Mg	
Sulfuric acid from external sources	197,260.900	Mg	
Ilmenite	51,557.441	Mg	
Slag	210.386	Mg	
Potassium chloride	223,147.961	Mg	
Potassium sulfate	0.00	Mg	
Ammonium sulfate from external sources	3,785.21	Mg	
Magnesite	12,735.78	Mg	
Product output			
NPK fertilizers	489,374.40	Mg	
NP fertilizers	25,163.40	Mg	
NS fertilizers	3,356.00	Mg	
Sulfuric acid	310,150.00	Mg	
Phosphoric acid	165,540.36	Mg	

Ammonia	243,304.60	Mg	
Urea	245,229.98	Mg	
NoxyTM(AdBlue)	143,175.09	Mg	
Titanium white	18,517.28	Mg	

6. Human Resources management			
Please provide the name and contact details for your Human Resources manager:		Magdalena Ostrowska Human Resources Management Department Manager magdalena.ostrowska@grupazoty.com	
	Total	Recruited in this reporting period	Terminated in this reporting period
Number of direct employees:	2,557	277	253
Number of contracted workers:			
Were there any collective redundancies during the reporting period?	Yes [] No [X]	If YES, please describe the redundancy plan, including reasons for redundancies, number of workers involved, how they were selected, consultation undertaken, and measures to mitigate the effects of redundancy:	
Are any redundancies to the workforce planned for the next year?	Yes [] No [X]	If YES, please describe the redundancy plan, including reasons for redundancies, number of workers involved, and selection and consultation process:	
Were there any changes in trade union representation at Company plants during the reporting period?	Yes [] No [X]	If YES, please provide details, and summarise engagement with trade unions during the reporting period:	
Were there any other worker representatives (e.g. in the absence of a trade union)?	Yes [] No [X]	If YES, please provide details and summarise engagement with them during the reporting period:	
Were there any changes in the status of Collective Agreements?	Yes [] No [X]	If YES, please provide details:	

Have employees raised any grievances with the project during the reporting period?	Yes [] No [X]	If YES, please state how many, split by gender, summarise the issues raised in grievances by male and female staff and explain how the Company has addressed them:
Have employees raised any complaints about harassment or bullying during the reporting period?	Yes [X] No []	If YES, please state how many, split by gender, summarise the issues raised by male and female staff and explain how the Company has addressed them: 6 complaints, including 2 raised anonymously. The other complaints were received from: - male employees - 2 reports concerned an argument with a co-worker and alleged undesirable behaviour of a superior; - female employee - 2 reports concerned an employee conflict (between two women) and bad working atmosphere. The same person as the complainant was involved in both situations. All the cases were investigated in accordance with the procedure laid down in applicable regulations, of which four investigations were completed by the end of the reporting period (without substantiating the complaints).
Have there been any strikes or other collective disputes related to labour and working conditions at the Company in the reporting period?	Yes [] No [X]	If YES, please summarise nature of, and reasons for, the disputes and explain how they were resolved:
Have there been any court cases related to labour issues during the reporting period?	Yes [X] No []	If YES, please summarise the issues contested and outcome: In a majority of closed cases, the claims were dismissed.

<p>Have there been any changes to the following policies or terms and conditions during the reporting period in any of the following areas:</p> <ul style="list-style-type: none"> - Trade union recognition - Collective Agreements - Non-discrimination and equal opportunities for all - Equal pay for equal work - Gender equality - Bullying and harassment, including sexual harassment - Employment of young workers under 18 - Wages and salaries (for regular and overtime hours) - Overtime - Working hours - Flexible working / work-life balance - Grievance mechanism for workers - Health & safety 	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>If YES, please give details, including of any new initiatives:</p> <ol style="list-style-type: none"> 1. During the reporting period, an agreement was concluded with the trade unions concerning payment of a one-off discretionary bonus. 2. Amendments to Collective Bargaining Agreement were introduced, which involved: <ol style="list-style-type: none"> a) the provisions of Schedule 11 - Rules for Annual Bonus Payment at Grupa Azoty Zakłady Chemiczne Police S.A. b) an increase in fringe benefits and rules for acquiring additional leave entitlement.
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7. Occupational Health and Safety Data

<p>Please provide the name and contact details for your Health and Safety manager:</p>	<p>Marek Mazurek OHS Office Manager marek.mazurek@grupazoty.com</p>				
	<p>Direct employees</p>	<p>Contracted workers</p>		<p>Direct employees</p>	<p>Contracted workers</p>

Number of man-hours worked in this reporting period:	Total time actually worked: 3,622.7 (thousand hours, rounded to one decimal place), including overtime: 17.0 (thousand hours, rounded to one decimal place)	0	Number of fatalities ⁷ :	0	0																		
Budget spent on OHS in this period (total amount and currency):	10,374,613.20	0	Number of disabling injuries:	0	0																		
OHS training provided in this period in person-days:	1,740	0	Number of Lost Time Incidents (including vehicular):	27	0																		
Number of lost workdays resulting from incidents:	1,114	0	Number of cases of occupational disease:	0	0																		
Number of sick days:	49,862	0																					
Accident causes (falling from height, carrying heavy loads, struck by a falling object, contact with a flame or a hot/burning object/environment, etc.):																							
<table border="1"> <thead> <tr> <th>Name</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Moving around</td> <td>11</td> </tr> <tr> <td>Chemical burn</td> <td>3</td> </tr> <tr> <td>Thermal burn</td> <td>1</td> </tr> <tr> <td>Mechanical injury</td> <td>10</td> </tr> <tr> <td>Traffic accident</td> <td>0</td> </tr> <tr> <td>Industrial process</td> <td>1</td> </tr> <tr> <td>Other</td> <td>1</td> </tr> <tr> <td></td> <td>27</td> </tr> </tbody> </table>						Name	Total	Moving around	11	Chemical burn	3	Thermal burn	1	Mechanical injury	10	Traffic accident	0	Industrial process	1	Other	1		27
Name	Total																						
Moving around	11																						
Chemical burn	3																						
Thermal burn	1																						
Mechanical injury	10																						
Traffic accident	0																						
Industrial process	1																						
Other	1																						
	27																						
Please provide details of any fatalities or major accidents that have not previously been reported to EBRD, including total compensation paid due to occupational injury or illness (amount and currency): Not applicable																							

Please summarise any emergency prevention and response training that has been provided for Company personnel during the reporting period:

The Company provides scheduled OHS and fire prevention training to employees in line with the following approved training programmes:

- General induction training provided by employees of the OHS Office and the Company Fire Brigade - new hires;
- Position-specific training.
- Periodic and supplementary OHS and fire safety training was provided on site and as self-learning based on educational materials prepared by the OHS Office and the Company Fire Brigade.

The training includes existing risks related to chemicals used, emergency procedures and crisis response.

Please summarise any emergency response exercises or drills that have been carried out during the reporting period:

- 21 on-site drills (covering chemical and technical rescue, firefighting techniques, and water rescue operations) were organised and carried out;
- In addition, three on-site drills were carried out at:
 - GA Polyolefins S.A.'s handling and storage terminal (HST);
 - GA Polyolefins S.A.'s PDH unit;
 - KRMIPOL Sp. z o.o.

8. Stakeholder Engagement

Please provide the name and contact details for your external relations or community engagement manager:

Kornelia Przygoda
Communication and Investor Relations
Office Manager
kornelia.przygoda@grupaaazoty.com

Please provide information on the implementation of the Stakeholder Engagement Plan agreed with EBRD and summarise interaction with stakeholders during the reporting period, including:

- meetings or other initiatives to engage with members of the public or public organisations during the reporting period
- information on environmental protection, social policy and safety matters provided to the local community and other stakeholders during the reporting period:
- coverage in the media:
- interaction with any environmental or other community groups.

Please describe any changes to the Stakeholder Engagement Plan (SEP) agreed with EBRD:

Grupa Azoty Police stays in touch with the local community and keeps it informed about its operations and affairs. The Company communicated with its stakeholders through:

- Ongoing cooperation with the Police Television channel, which includes production of a TV programme called 'News from Grupa Azoty Zakłady Chemiczne Police S.A.', broadcast every two weeks. Programmes about the Company, including current and archival productions, are available at www.tvpolice.pl.
- Publications about the company on dziennikpolicki.pl and police24.pl
- Press conferences during which Company representatives communicate the most important information concerning Grupa Azoty Police.
- Intranet, i.e. the Company's internal computer network through which it communicates with the employees. Apart from current announcements, a range of other information is also available over the Intranet, including the Company's Articles of Association, regulations and other by-laws, the books of processes, procedures, etc.
- Facebook and LinkedIn - the Company uses the tools to communicate with its employees, the local community, as well as other people who follow the Company's activities, including customers. On Facebook, the Company posts notices and photo galleries of various events.

How many complaints or grievances did the project receive from members of the public or civil society organisations during the reporting period? Please split by stakeholder group. Summarise any issues raised in the complaints or grievances and explain how they were resolved:

0

9. Community Development

One element of Grupa Azoty POLICE's strategy is to support the development of local communities and to engage with educational institutions. In 2023, the Company further cultivated its socially responsible image by expanding and strengthening collaborations with various entities, including secondary schools, universities, local government, and the broader socio-economic community.

Donation policy

Support in the form of donations constitutes the primary activity within the framework of corporate social responsibility. The Company has in place a Charitable Policy, which sets out the directions of support. The causes for which donations are given are detailed in the Donation Rules.

Social campaigns

In 2023, Grupa Azoty POLICE carried out several initiatives designed to foster positive relations with its employees and the local community. These initiatives involved not only the Company's employees but also their families.

Children's Day with the Company Fire Brigade - a day full of fun activities for the youngest, which attracted considerable interest. In addition to fun and games, fire extinguishing equipment was demonstrated, also admired by adults. All children participating in the event received a small gift and cotton candy.

Together for Generations - a tree planting initiative in the Wkrzańska Forest, in which employees were involved bringing along their family members. 2,500 pine seedlings were planted over 25 ares. The event ended with a communal bonfire.

For the second time, the Grupa Azoty Group ran the Employee Volunteering Programme. Employees of Grupa Azoty POLICE delivered two projects:

- Green enclave for our welfare - a project designed to promote social commitment of employees and the local community of Nowe Warpno. As part of the project, greenery was created at the School and Kindergarten Complex in Nowe Warpno for pupils and the local community.
- Hands full of kindness - a project in which volunteers renovated warehouse and office space occupied by the Caritas organisation in Police. Shelving racks, the necessary furniture and fittings were purchased to equip the premises.

For the first time, the Company hosted an indoor Flea Market. Employees were asked to donate things they no longer needed such as decorative items, books, toys, etc. Following the collection, the items were put out for sale and the proceeds raised were donated to the Szczecin Province Hospice for children and adults in Szczecin. Because the event was a success, it was repeated twice - after the summer holidays and before Christmas. Further editions are planned for 2024.

Charitable activities

Grupa Azoty Police supported the Corpus Christi Roman Catholic Parish in Szczecin, which organised a holiday camp for 80 children. The camp was intended for a group of children associated at the parish and led by several married couples acting as volunteers. A significant number of the camp participants were individuals from underprivileged backgrounds, including children from multi-child families.

Development of sports

In 2023, Grupa Azoty POLICE continued its cooperation with the female volleyball club Chemik Police. In the 2022/2023 season, the team won Poland's Cup and participated on the PreZero Grand Prix PLS beach volleyball tournament. In the Champions' League, the team progressed to the round of 16.

Recognising that support of local sports clubs yields tangible benefits primarily for the local community, Grupa Azoty POLICE provided support to the People's Sports Club in Trzebież, a football club for children from the small town who often lack access to sports activities outside their community.

Assistance was also given to the Foundation for Polish Values, which is the organiser of the annual Bieg Tropem Wilczym (Wolf's Trail Run) event. The Run serves not only to promote healthy activity in the open air

but also, above all, to commemorate the Cursed Soldiers.

Through the Grupa Azoty Group Foundation for the development of volleyball, the Company joined the organisation of the finals of the children's provincial volleyball championships. In the finals, 36 teams participated, with six categories available for both boys and girls. The top two teams from each category progressed to the final of the Polish championship.

Development of culture

In 2023, Grupa Azoty Police co-financed the world premiere of 'Mater Ecclesiae - Regina Pacis', a work composed to mark the fifth anniversary of the papal coronation of the image of Our Lady of the Victory - Queen of Poland and the votive offering of a golden rosary as a token of gratitude and entrustment to Virgin Mary. The work was performed by the Szczecin Maritime Academy Choir accompanied by a chamber orchestra.

Once again, the Company organised the Gala of Merit to honour its outstanding employees. More than 200 employees of the Company and Grupa Azoty Police Serwis received medals for outstanding service to Grupa Azoty POLICE. In addition, 34 employees received the Gold Medal for Long Service from the President of Poland. The ceremony was held at the Dobosz Hotel in Police.

Development of education

Grupa Azoty POLICE consistently works towards the development of professional and occupational education. The Company maintains its collaboration with secondary schools, universities, local government, and the socio-economic community to enhance the competencies of its employees and to recruit graduates from schools with the requisite competencies, in line with the adopted HR strategy of Grupa Azoty Police. In 2023, Grupa Azoty Police took patronage of classes for future power engineering, electronics, mechatronics and automation technicians at the Electricity and Electronics School Complex in Szczecin. The Company actively participates in restoring vocational education and offers traineeship opportunities in the fields covered by its patronage for environmental protection technicians, chemical technology technicians, plastic processing machinery and equipment operators, refrigeration and air conditioning technicians, and renewable energy equipment and system technicians. Many students from the region were granted scholarships and were able to participate in vocational training.

The Company's activity to link business with science also includes cooperation with universities. In 2023, the Company signed an agreement with Collegium Balticum - Academy of Applied Sciences in Szczecin to collaborate on student internship programmes at the Company. Grupa Azoty POLICE responded to students' needs by providing them with selected information which was then used in many dissertations. The Company arranges internships and work placements which attract students from the region.

The Hydrogen Academy was an extremely valuable project implemented in 2023. It aims to educate and foster the development of highly qualified specialists in hydrogen technologies, impart knowledge about the advantages and challenges of using hydrogen, and promote innovative solutions based on hydrogen technology. In the inaugural edition, 27 scholarship recipients commenced their studies at the Szczecin Hydrogen Academy, founded by Grupa Azoty Zakłady Chemiczne Police S.A. and the Szczecin University of Technology. The project is carried out as part of the West Pomeranian Hydrogen Valley. The scholarship recipients were 15 students, six doctoral students and six employees of Grupa Azoty. They were on paid internships in August and September 2023.

The first edition of the Hydrogen Academy was summarised in September 2023 during the 'Energy Crisis and the Rise of Hydrogen' conference hosted by the West Pomeranian University of Technology in Szczecin and Grupa Azoty Zakłady Chemiczne Police S.A. Graduates presented their projects, demonstrating the knowledge gained and boasting what they had achieved during the Academy sessions. The projects covered various aspects, including the development of a hydrogen market, the implementation of the European Union's hydrogen strategy considering the Grupa Azoty Group's potential, the 'green shift' in raw material diversification, technical solutions related to hydrogen technologies, applications of hydrogen technologies in decarbonisation and emissions reduction, the development of a green hydrogen market, the production and application of green hydrogen and transport of hydrogen. To conclude the training programme, participants embarked on a study tour of GreenLab, a Danish company serving as a green and circular energy park and a national research facility.

It was an opportunity to get acquainted with the latest research into green energy and related technologies, while confronting the newly acquired theory with practice.

Considering the need to support science, education, schools and academic institutions, the Company supported a number of competitions, providing funds toward the purchase of prizes.

'Superheroes in the Laboratory' was a competition organised by the Youth Support Centre on behalf of the Szczecin Education Authority. It was dedicated to students of grades 7 and 8 of primary schools, secondary schools and other educational establishments to foster their creative potential and encourage independent conduct of experiments.

'Mathematics in Focus' was another competition which Grupa Azoty POLICE joined as a partner. It is a photographic competition initiated in 2010 and organised by the University of Szczecin. This prestigious international competition aims to promote mathematics - the queen of science - through the medium of photographic art.

Activities promoting national traditions and patriotic attitudes

An important component of social and sponsorship activities is the support of initiatives cultivating and fostering Polish traditions and national identity and strengthening national, civic and cultural awareness. To this end, in 2023 the Company continued its cooperation with the Foundation for Polish Values, which supports Poles living in the Eastern Borderlands. For many years now, the Foundation's flagship project has been the Package for the Compatriot and Hero Living in the Eastern Borderlands campaign, aiming to donate Easter and Christmas gifts for Poles and their families living east of Poland.

Health promotion initiatives

The Polish Association of Honorary Blood Donors - the Henri Dunant Honorary Blood Donors Club of Police, supported by Grupa Azoty POLICE, is active in the Police County, promoting the idea of voluntary blood giving. Blood drives are held on the Company's premises on a regular basis, attracting many of its employees. Since 2018, the Association has again operated under the Company's auspices.

In 2023, the Independent Public Provincial Hospital Complex in Szczecin received funding to purchase a patient monitoring set. Efforts for the protection and promotion of human health and safety are among the priorities of the Company's charitable activities. Through the adoption of its Charitable Policy, the Company has committed itself to fulfilling its role as a responsible employer, community member, and good neighbour. The Company supports various initiatives considering the specific needs of local communities.

Total cost of activities for the benefit of local communities and donations in 2023 amounted to 162 thousand pln

ENVIRONMENTAL AND SOCIAL ACTION PLAN

GRUPA AZOTY ZAKŁADY CHEMICZNE POLICE S.A.

5. Actions required to maintain compliance with EHS requirements of national law and EU environmental standards – GRUPA AZOTY ZAKŁADY CHEMICZNE POLICE S.A.							
No.	Action	Environmental risks, liabilities/benefits	Legislative requirements/Best practice	Requirement/Resourses	Scheduled completion - action to be completed by end of year	Target and evaluation criteria for implementation progress	Comments
5.1	<p>Complete the planned modernisation of energy generation installations to ensure compliance with Annex V to IED.</p> <p>Target emission levels: 200 mg/m³ for SO₂ 200 mg/m³ for NO_x 20 mg/m³ for PM.</p>	<p>Reduce negative environmental impact in line with IED requirements.</p> <p>Asses further methods of reducing energy intensity and carbon emissions from energy installations as part of the project and future BAT assessment.</p>	Legislative requirements, best management practices, Bank's PRs	Investment needs	2018	<p>Obtain a relevant permit for the new facilities</p> <p>Update information on the project in the annual report, selected technology and target emission levels.</p> <p>Publish NTS of the project and provide copy/web link to the Bank as part of the annual report.</p>	Provide update in the 2017 annual report.

	In May 2018, a flue gas treatment system built to ensure compliance of the EC II CHP plant with the requirements of the Industrial Emissions Directive was commissioned for regular operation. The flue gas treatment system is now in operation at the EC II CHP plant, and the NO _x , SO ₂ and PM concentrations do not exceed the limits set down in the IED. Capex on the flue gas treatment project amounted to PLN 252,005 thousand.						
5.2	Monitor environmental impacts of landfill sites and continue planned technical development.	Reduce negative environmental impact of landfill sites. Develop long-term action to further monitor and reduce impact of the landfill site as part of BAT assessment in 2015.	Legislative requirements, best management practices, Bank's PRs	Internal resources and investments	Ongoing	Summary of the action plan in the annual report	
<p>Information:</p> <p>The environmental impact of landfill sites (Section 5.2) was monitored in accordance with: Decision by the Marshal of the Szczecin Province approving the iron sulfate landfill operation manual (Ref. No. WOŚ.II.7241.3.4.2020.AM, dated 10 December 2020), and Decision by the Marshal of the Szczecin Province approving the phosphogypsum landfill operation manual (Ref. No. WOŚ.II.7241.12.2022.AM, dated 6 July 2022).</p>							
5.3	Complete modernisation of heating oil storage depot - execution stage	Reduce negative environmental impact of the HFO (heavy fuel oil) storage areas. HFO storage must be modernised.	Legislative requirements, best management practices, Bank's PRs	Internal funds	Completed on 29 August 2014.	Summary in the annual report	
<p>Information:</p> <p>The following work was completed: installation of oil-tight bunds for F3 and F4 storage tanks (light fuel oil), installation of oil-tight bunds for F5 and F6 storage tanks (heavy fuel oil), construction of stormwater drainage system, installation of I&C system for measuring oil levels in the tanks, as well as testing of tank truck earthing continuity during oil unloading. The project was completed. Expenditure incurred: PLN 1,355,850</p>							
5.4	Prepare a plan (including budget) and conduct soil and groundwater assessment.	Reduce negative environmental impact in line with IED	Legislative requirements, best management practices, Bank's PRs	Internal resources and external support	2015	Report on soil and groundwater condition	

Information:

The Company regularly assesses the risk of soil, ground and groundwater contamination with hazardous substances from the Company's units and installations (in compliance with the integrated (IPPC) permit granted by Decision of the Marshal of the Szczecin Province Ref. No. WOŚ.II.7222.13.9.2013.MG, as amended, dated 9 January 2014).

The assessment takes into account actions, procedures and measures taken to prevent contaminants from entering the ground. The 'Assessment of the risk of soil, ground and groundwater contamination' is performed in line with Scheme No. SP-O-P06-01, using dedicated software. The related monitoring covers procedures aimed at removing the consequences of incidents and preventive measures taken to minimise the risk of occurrence of similar incidents in the future.

1. Information about the Company			
Company Name: Grupa Azoty Zakłady Azotowe Puławy S.A.			
Company Address: Aleja Tysiąclecia Państwa Polskiego 13			
Country: Poland			
Town/Location: Puławy			
Company authorised representative: Hubert Kamola I certify that the data contained in this report completely and accurately represents the Company's operations during the reporting period. Signature:			
Title: Vice President of the Management Board		Date: 30 April 2024	
Contact Details:			
Telephone: (+48) 81 565 20 50 E-mail: Hubert.Kamola@grupaaazoty.com			

Please provide key data on the Company performance, as well as production levels at each plant. For each of the 7 large plants please provide:

Item	Cumulative			
	(PLN '000)	Performance 2021	Performance 2022	Performance 2023
Revenue		4,950,318	8,060,098	3,791,621
Profit/(loss) on sales		394,910	731,526	(652,336)
EBIT		114,303	174,485	(593,677)
EBITDA		623,712	982,702	(339,462)
Net profit/(loss)		197,226	236,629	(602,715)

* In accordance with the accounting policies applied by the GA Group.

Key performance indicators in terms of energy consumption, emissions, use of natural resources, and carbon dioxide emissions;
Number of staff employed and any change in employment over past 3 years

	As at 31 Dec 2021	As at 31 Dec 2022	As at 31 Dec 2023
Number of direct employees:	3,624	3,647	3,493
Number of contracted workers:	27	32	47

Provide information on permits and each subsidiary's compliance status with IPPC/IED (*Integrated Pollution Prevention and Control Directive/Industrial Emissions Directive*)

Environmental decisions held by Grupa Azoty Zakłady Azotowe Puławy S.A.

A. Integrated permit

- Decision of the Provincial Office of Lublin No. PZ 7/2004 Ref. No. ŚiR.V.6618/31-5/04, granting to Zakłady Azotowe Puławy S.A. of Puławy an integrated (IPPC) permit to operate chemical industry installations to manufacture, using chemical processes, organic and inorganic chemicals and artificial fertilizers, a fuel combustion plant with a rated capacity of no less than 50 MW, a landfill intended for wastes other than hazardous and inactive waste, an ammonia storage and distribution tank, and a wastewater treatment installation.

Amending decisions:

- Decision No. PZ 12/2007 of 12 December 2007, Ref. No. ŚiR.V.6618/14-12/2006/2007, issued by the Governor of the Lublin Province
- Decision No. PZ 8/2008 of 25 November 2008, Ref. No. RŚ.IŁ.0722/12/08, issued by the Marshal of the Lublin Province
- Decision No. PZ 21/2010 of 27 July 2010, Ref. No. RŚ.V.MJ.7624/52/08, issued by the Marshal of the Lublin Province
- Decision No. PZ 16/2011 of 9 August 2011, Ref. No. RŚ.V.IŁ.7624/52/08, issued by the Marshal of the Lublin Province
- Decision No. PZ22/2012 of 28 November 2012, Ref. No. RŚ.V.IŁ.7624/52/08, issued by the Marshal of the Lublin Province
- Decision No. PZ23/2014 of 23 October 2014, Ref. No. RŚ-V.7222.46.2014.ILU, issued by the Marshal of the Lublin Province
- Decision No. PZ45/2014 of 28 November 2014, Ref. No. RŚ-V.7222.46.2014.ILU, issued by the Marshal of the Lublin Province
- Decision No. PZ7/2015 of 8 April 2015, Ref. No. RŚ-V.7222.46.2014.ILU, issued by the Marshal of the Lublin Province
- Decision No. PZ15/2015 of 24 June 2015, Ref. No. RŚ-V.7222.46.2014.ILU, issued by the Marshal of the Lublin Province
- Decision No. PZ6/2016 of 26 February 2016, Ref. No. RŚ-V.7222.46.2014.MCHW, issued by the Marshal of the Lublin Province
- Decision No. PZ 15/2017 of 11 July 2017, Ref. No. RŚ-V.7222.46.2014.MCHW, issued by the Marshal of the Lublin Province
- Decision No. PZ 30/2017 of 18 December 2017, Ref. No. RŚ-V.7222.46.2014.ILU, issued by the Marshal of the Lublin Province
- Decision No. PZ 14/2018 of 24 April 2018, Ref. No. RŚ-V.7222.46.2014.ILU, issued by the Marshal of the Lublin Province
- Decision No. PZ 23/2019 of 6 November 2019, Ref. No. RŚ-V.7222.46.2014.ILU, issued by the Marshal of the Lublin Province
- Decision No. PZ 4/2020 of 11 February 2020, Ref. No. RŚ-V.7222.46.2014.ILU, issued by the Marshal of the Lublin Province
- Decision No. PZ4/2020 of 28 July 2021, Ref. No. RŚ-V.7222.46.2014.ILU, issued by the Marshal of the Lublin Province
- Decision No. PZ2/2022 of 18 January 2022, Ref. No. RŚ-V.7222.46.2014.ILU, issued by the Marshal of the Lublin Province
- Decision No. PZ10/2022 of 15 June 2022, Ref. No. RŚ-V.7222.46.2014.ILU, issued by the Marshal of the Lublin Province
- [Decision No. PZ5/2023 of 25 January 2023, Ref. No. RŚ-V.7222.46.2014.ILU, issued by the Marshal of the Lublin Province](#)
- [Decision No. PZ22/2023 of 5 September 2023, Ref. No. RŚ-V.7222.46.2014.ILU, issued by the Marshal of the Lublin Province.](#)

B. Integrated permit

- Decision No. PZ22/2018 of 11 July 2018, Ref. No. RŚ-V.7222.2.2018.ILU, issued by the Marshal of the Lublin Province to operate chemical industry installations to manufacture, using chemical or biological processes, straight or compound fertilizers based on phosphorus, nitrogen or potassium.

Validity period - indefinite

Amending decisions:

- Decision No. PZ22/2018 of 19 January 2021, Ref. No. RŚ-V.7222.2.2018.ILU, issued by the Marshal of the Lublin Province
- Decision No. PZ22/2018 of 25 May 2021, Ref. No. RŚ-V.7222.2.2018.ILU, issued by the Marshal of the Lublin Province
- Decision No. PZ22/2018 of 21 September 2021, Ref. No. RŚ-V.7222.2.2018.ILU, issued by the Marshal of the Lublin Province
- [Decision No. PZ1/2024 of 4 January 2024, Ref. No. RŚ-V.7222.2.2018.ILU, issued by the Marshal of the Lublin Province.](#)

B. Decision permitting participation in the EU emissions trading scheme - installation: CHP Plant

- Decision of 9 August 2016, Ref. No. RŚ-V.7225.8.2016.ARA , issued by the Marshal of the Lublin Province as amended by:
- Decision of 21 March 2017, Ref. No: RŚ-V.7225.8.2016.MCHW, issued by the Marshal of the Lublin Province
- Decision of 7 February 2018, Ref. No: RŚ-V.7225.8.2016.AGK, issued by the Marshal of the Lublin Province
- Decision of 18 April 2019, Ref. No: RŚ-V.7225.8.2016.AGK, issued by the Marshal of the Lublin Province
- Decision of 22 March 2021, Ref. No: RŚ-V.7225.8.2016.AGK, issued by the Marshal of the Lublin Province
- Decision of 8 March 2022, Ref. No. RŚ-V.7225.8.2016.AGK, issued by the Marshal of the Lublin Province (effective as of 1 January 2021)

C. Decision granting permit for greenhouse gas emissions by process installations

- Decision of 9 August 2016, Ref. No: RŚ-V.7225.7.2016.ARA, issued by the Marshal of the Lublin Province, as amended by:
- Decision of 21 March 2017, Ref. No: RŚ-V.7225.7.2016.MCHW, issued by the Marshal of the Lublin Province
- Decision of 8 February 2018, Ref. No: RŚ-V.7225.7.2016.AGK, issued by the Marshal of the Lublin Province
- Decision of 5 April 2019, Ref. No: RŚ-V.7225.7.2016.AGK, issued by the Marshal of the Lublin Province
- Decision of 22 March 2021, Ref. No: RŚ-V.7225.7.2016.AGK, issued by the Marshal of the Lublin Province
- Decision of 10 February 2022, Ref. No. RŚ-V.7225.7.2016.AGK, issued by the Marshal of the Lublin Province (effective as of 1 January 2021)

D. Sector permits

- [Decision approving the landfill site operation manual dated 31 January 2023, Ref. No: Ś.III.7241.2.2023.MCHW, issued by the Marshal of the Lublin Province.](#)

E. Safety report

Safety report approved by the Commander-in-Chief of the State Fire Service in the Lublin Province by way of Decision No. 1/2020 (Ref. No. WZ.5586.26.2019.AK) of 25 March 2020. The other documents required under the Environmental Protection Law, i.e. the notification, Industrial Accident Prevention Programme and Emergency Plan, were submitted together with the report. The Commander-in-Chief of the State Fire Service in the Lublin Province raised no reservations about the notification and gave a favourable opinion on the remaining documents.

By letter Ref. No. WI.7060.1.57.2019.RG of 15 January 2020, the Environmental Protection Inspector for the Lublin Province endorsed the Safety Report submitted by Grupa Azoty Zakłady Azotowe Puławy

S.A.

In 2023, the Emergency Plan for Grupa Azoty Zakłady Azotowe Puławy S.A. was updated. The document was approved without reservations by the Commander-in-Chief of the State Fire Service in the Lublin Province by letter Ref. No. WR.5217.15.2023 of 27 November 2023.

Reporting period: 2023

2. General information		
Is the project materially compliant with all relevant EBRD Performance Requirements (taking account of agreed action plans, exemptions or derogations)?	Yes [<input checked="" type="checkbox"/> No [<input type="checkbox"/>	If NO, please provide details of any material non-compliances:
Is the project materially compliant with all applicable environmental and social laws and regulations?	Yes [<input checked="" type="checkbox"/> No [<input type="checkbox"/>	If NO, please provide details of any material non-compliances:
Have there been any accidents or incidents that have caused damage to the environment, brought about injuries or fatalities, affected project labour or local communities, affected cultural property, or created liabilities for the company?	Yes [<input type="checkbox"/> No [<input checked="" type="checkbox"/>	If YES, please describe, including details of actions to remedy and prevent reoccurrence:
Have there been any changes to environment, social, labour or health and safety laws or regulations that have materially affected the Company?	Yes [<input checked="" type="checkbox"/> No [<input type="checkbox"/>	If YES, please describe: Following the publication of the Best Available Techniques (BAT) Conclusions for Common Waste Gas Management and Treatment Systems in the Chemical Sector (WGC), it was necessary to review the terms of the integrated (IPPC) permit granted to the Company for conformity with the BAT conclusions. Following the review, the Company received a notice from the Marshal Office requesting it to obtain an amendment of the integrated permit and specifying how it should be adapted to the conditions laid down in the BAT conclusions. Amendments to the integrated permit are required to be made within a year from the notice date (by 7 July 2024), while the Company is required to bring the relevant units into compliance with the BAT conclusions by 12 December 2026.

<p>How many inspections did you receive from the environmental authorities during the reporting period?</p>	<p>Number: 4</p>	<p>Please provide details of such inspections, including the number and nature of any violations found:</p> <p>During the period under review, four inspections were carried out by the Provincial Environmental Inspectorate:</p> <ul style="list-style-type: none"> • From 21 December 2022 to 17 January 2023, an inspection was carried out by the Environmental Protection Inspectorate for the Lublin Province and the Marshal Office of the Lublin Province concerning the application for an amendment to the integrated (IPPC) permit with regard to waste management: closure and rehabilitation of cell 1 within the landfill site. The inspection found no violations and no requirement notices were issued. • From 13 March 2023 to 30 March 2023, an inspection was carried out by the Environmental Protection Inspectorate for the Lublin Province concerning compliance with the conditions regarding the quality and quantity of wastewater introduced into water or into the ground, as specified in relevant water-law permits and integrated (IPPC) permits. The inspection was related to an oil spill accident that had occurred at the Nitric Acid Department. Tests of water sampled from the Vistula River, carried out by both the Lublin Branch of the Central Testing Laboratory and the Company's in-house laboratory, did not reveal any impact of the accident on the river water quality. The inspection found no violations and no requirement notices were issued. • From 18 April to 18 May 2023, an inspection was carried out by the Environmental Protection Inspectorate for the Lublin Province to check compliance with the requirements for classification of certain items or substances as by-products. The inspection found no violations and no requirement notices were issued. • From 14 June 2023 to 29 June 2023, an inspection was carried out by the Environmental Protection Inspectorate for the Lublin Province covering compliance with the regulations on chemical substances and mixtures, and the prevention of major industrial accidents. The inspection found no
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		violations and no requirement notices were issued.
How many inspections did you receive from the health and safety authorities during the reporting period?	Number: 6 inspections during the 2023 calendar year.	<p>Please provide details of these visits, including number and nature of any violations found:</p> <p>The inspections concerned:</p> <ul style="list-style-type: none"> - compliance with the workplace health and safety requirements, including in connection with the use of chemical substances and mixtures, - G19 building - drivers terminal. Emergency inspection of hygienic and sanitary conditions in restroom facilities at gate 5, - Inspection covering the Reach-Ec-Force 11 Project with respect to preparation of material safety data sheets for marketed chemical substances and mixtures. <p>No requirement notices were issued following the above inspections.</p>

<p>How many inspections did you receive from the labour authorities during the reporting period?</p>	<p>Number: 2 inspections during the 2023 calendar year.</p>	<p>Please provide details of such inspections, including the number and nature of any violations found:</p> <p>In 2023, the National Labour Inspectorate (PIP) carried out the following inspections at Grupa Azoty Puławy:</p> <p>Inspection carried out in March to examine selected issues pertaining to legal labour protection and technical requirements of safety at work:</p> <p>The inspection covered staff members - chemical process operators substituting for chemical process controllers from the Urea Department and Caprolactam Department, and escort guards substituting for pass clerks.</p> <p>Following the inspection, the National Labour Inspectorate issued an order of 6 April 2023 requiring the inspected party to:</p> <ol style="list-style-type: none"> 1. Refer the designated employees for initial medical check-ups. 2. Provide the designated employees with induction on-the-job training in health and safety requirements for process controllers. 3. Advise the designated employees employed as process operators of occupational risks involved in the work of process controllers and the rules of protection against the job-specific hazards, and document the fact that such information has been communicated to those employees. 4. Provide induction on-the-job training in health and safety requirements to employees employed as guards substituting for pass clerks. 5. Advise the employees of occupational risks involved in the work of pass clerks and the rules of protection against the job-specific hazards, and document the fact that such information has been communicated to those employees. <p>Improvement notice from the National Labour Inspectorate of 6 April 2023 requiring the inspected party to:</p> <ol style="list-style-type: none"> 1. Keep records evidencing that employees have been acquainted with the occupational risk assessment for all jobs as the scope of the risk assessment was extended to cover the SARS-COV -2 hazard. 2. Assign tasks other than those expressly specified in the employment contract only in the manner prescribed by law (Art. 29.1.2 of the Labour Code, Art. 42.4 of the Labour Code). 3. Strictly adhere to the internal regulations and procedures for the horizontal promotion of employees. <p>Information on the fulfilment of the above</p>
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	<p>requirements of the National Labour Inspectorate's order and improvement notice was submitted to the National Labour Inspectorate within the prescribed time limit. Inspection carried out in November and December covering the employer's compliance with the regulations on equal treatment in employment with respect to horizontal and vertical employee promotions. Improvement notice from the National Labour Inspectorate of 21 December 2023 requiring the inspected party to:</p> <ol style="list-style-type: none">1. Annually set a deadline by which employees can apply for a horizontal promotion in a given calendar year.2. Implement post-audit prescription Ref. No. 06/A/P/ZA/2022 of 18 May 2023 concerning,3. Strictly comply with the labour law by providing employees with at least 11 hours of daily rest.4. Not make the provision of information to the Works Council conditional on confidentiality undertakings from its members.5. Consider on its merits the Works Council's request for information letter Ref. No. RPV/7/2023, dated 14 November 2023, and provide the requested information to the Works Council in whole or in part.6. Take organisational and technical measures to bring the working conditions of chemical process operators staffing the absorption and cooling water units, steam generators, oxidation apparatus and turbochargers, department head, senior process engineer, catalyst engineer, shift foreman and supervisor at the Fertilizer Plant of the Nitric Acid Department into compliance with the regulations concerning the levels of workers' exposure to agents harmful to human health. <p>Information on the fulfilment of the above requirements of the National Labour Inspectorate's improvement notice was submitted to the National Labour Inspectorate within the prescribed time limit.</p>
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Have these visits resulted in any penalties, fines and/or corrective action plans?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	If YES, please describe, including status of implementing corrective actions to address any violations found: Corrective actions Improvement notice from the National Labour Inspectorate of 21 December 2023 1. Take organisational and technical measures to bring the working conditions of chemical process operator staffing the absorption and cooling water units, chemical process operator staffing steam generators and oxidation apparatus and chemical process operator staffing turbochargers, department head, senior process engineer, catalyst engineer, shift foreman and supervisor at the Fertilizer Plant of the Nitric Acid Department into compliance with the regulations concerning the levels of workers' exposure to agents harmful to human health. Information on the fulfilment of the above requirement of the National Labour Inspectorate's improvement notice was submitted to the National Labour Inspectorate within the prescribed time limit.
Has the Company engaged any contractors for project-related work in the reporting period?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	If YES, please state for which types of work, and how the Company has monitored the compliance of contractors with EBRD Performance Requirements and the Environmental and Social Action Plan:
Were any of the violations stated above the responsibility of contractors?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	If YES, please provide details, including how the Company is ensuring that corrective actions are implemented by the contractor? During inspections, recommendations are issued - such recommendations are presented in inspection reports or given orally. Compliance with the recommendations is checked during subsequent inspections. In the event of serious non-compliances, work is interrupted until the problem is remedied.
Have any operations been reduced, temporarily suspended or closed down due to environmental, health, safety or labour reasons?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	If YES, please describe:
<p>Please describe any environment or social programmes, initiatives or sub-projects undertaken during the reporting period to improve the Company's environmental or social performance and/or management systems: See Section 9.</p> <p>Please indicate the level of associated expenditure (capital expenditure and operating expenditure), and whether this relates to the requirements of the Environmental and Social Action Plan, or to any other initiative: See Section 9.</p>		

3. Status of the Environmental and Social Action Plan

Please provide information on the status of each item in the Environmental and Social Action Plan (ESAP) agreed with EBRD. If the ESAP was updated during the reporting period, please attach a copy of the new plan.
[See the Appendix.](#)

4. Environmental Monitoring Data for each of the key subsidiaries

The information required in this section can be extracted from a CSR report, or a full CSR report can be attached.

Please provide the name and contact details for your environmental manager:			Ewa Wodecka - Chief Environmental Protection Officer, email: ewa.wodecka@grupaaazoty.com Telephone: (+48) 81 565 21 27	
Parameter²	Amount³	Unit	Compliance Status⁴	Comments⁵
Wastewater	2023			
Total wastewater	59,864	'000 m ³		
Biochemical Oxygen Demand (BOD5)	4.9	mg/dm ³	Compliant with Integrated Permit	
Chemical Oxygen Demand (COD)	26.6	mg/dm ³	Compliant with Integrated Permit	
Suspended solids	13.8	mg/dm ³	Compliant with Integrated Permit	
Phosphorus	0.39	mg/dm ³	Compliant with Integrated Permit	
Nitrates	8.2	mg/dm ³	Compliant with Integrated Permit	
Heavy metals				
Zinc	0.047	mg/dm ³	Compliant with Integrated Permit	
Nickel	0.002	mg/dm ³	Compliant with Integrated Permit	
Lead	0.0	mg/dm ³	Compliant with Integrated Permit	
Chromium	0.001	mg/dm ³	Compliant with Integrated Permit	
Copper	0.009	mg/dm ³	Compliant with Integrated Permit	
Arsenic	0.0	mg/dm ³	Compliant with Integrated Permit	
[Other]				
Air emissions	Per each major point source	Mg/year		
SO ₂	2,468.68	Mg/year	Compliant with Integrated Permit	
Nitrogen oxides (NO _x)	1,712.88	Mg/year	Compliant with Integrated Permit	
Ammonium nitrate dust	190.06	Mg/year	Compliant with Integrated Permit	
Urea dust	16.51	Mg/year	Compliant with Integrated Permit	
Ammonium sulfate dust	3.98	Mg/year	Compliant with Integrated Permit	
Melamine dust	1.83	Mg/year	Compliant with Integrated Permit	
Particulate matter from fuel combustion	46.05	Mg/year	Compliant with Integrated Permit	
CO ₂	2,228,330.84	Mg/year	Compliant with Integrated Permit	
Other parameters				
Noise emissions	Night time 46.6 - 50.5 Daytime 40.4 - 42.6	dB dB	Compliant with Integrated Permit	
[Other]				

Solid waste		
Please provide details of the types and amounts of solid wastes generated by the project. Indicate where wastes are classified as hazardous. Indicate the final re-use, recycle or disposal method for each waste type.		
2023		
Waste type	Generated [Mg]	Permitted in Integrated Permit [Mg]
Hazardous waste	389.3180	Compliant with Integrated Permit
Non-hazardous waste	45,476.1861	Compliant with Integrated Permit
Total	45,865.5041	Compliant with Integrated Permit
[Mg]		
Self-management of waste – total, including:		697.3370
- Recovery		4,696.6212
- Storage		44,073.0959
Waste transferred to external companies holding appropriate permits for waste collection/recovery/disposal, including:		41,340.1789*
- waste generated in this reporting year		178.8960*
Waste stored at year end as a proportion of waste generated during this reporting year, including:		105.4510
- Hazardous		73.4450
- Non-hazardous		697.3370

* - the amount of waste includes waste generated in connection with the operation of installations covered by the Integrated Permit as well as waste generated outside those installations.

5. Resource Usage and Product Output			
Parameter	Amount	Measurement Unit	Comments ⁶
Fuels used			
Crude oil	-		
Natural gas	621,965	Tm ³	Jointly as feedstock and fuel
Hard coal	438,554	t	
Lignite			
Grid electricity	744,603	MWh	Energy purchased for own needs and for resale
Heat purchased from external sources	-		
Feedstocks and raw materials used			
Benzene in processing	5,915	t	
Polyethylene	1,066,902	kg	
Sulfur	5,042	t	
Product output			
Ammonium nitrate	22,959	t	
Caprolactam	7,678	t	
Urea	620,453	t	
Melamine	22,757	t	
6. Human Resources management			

Please provide the name and contact details for your Human Resources manager:		Renata Kubiś, Head of HR Administration - telephone: (+48) 81 565 37 55 email: renata.kubis@grupaaazoty.com	
	Total	Recruited in this reporting period	Terminated in this reporting period
Number of direct employees:	3,493	152	305
Number of contracted workers:	31	6	8
Were there any collective redundancies during the reporting period?	Yes [] No [X]	If YES, please describe the redundancy plan, including reasons for redundancies, number of workers involved, how they were selected, consultation undertaken, and measures to mitigate the effects of redundancy:	
Are any redundancies to the workforce planned for the next year?	Yes [] No [X]	If YES, please describe the redundancy plan, including reasons for redundancies, number of workers involved, and selection and consultation process:	
Were there any changes in trade union representation at Company plants during the reporting period?	Yes [X] No []	If YES, please provide details, and summarise engagement with trade unions during the reporting period: Changes in the positions of chair and deputy chair of the Intercompany Trade Union of Zakłady Azotowe Puławy Workers.	
Were there any other worker representatives (e.g. in the absence of a trade union)?	Yes [X] No []	If YES, please provide details and summarise engagement with them during the reporting period: There is a Works Council at the Company, which operates as a consultation body pursuant to the Act on the Provision of Information to Employees.	
Were there any changes in the status of Collective Agreements?	Yes [] No [X]	If YES, please provide details:	
Have employees raised any grievances with the project during the reporting period?	Yes [] No [X]	If YES, please state how many, split by gender, summarise the issues raised in grievances by male and female staff and explain how the Company has addressed them:	
Have employees raised any complaints about harassment or bullying during the reporting period?	Yes [] No [X]	If YES, please state how many, split by gender, summarise the issues raised by male and female staff and explain how the Company has addressed them:	
Have there been any strikes or other collective disputes related to labour and working conditions at the Company in the reporting period?	Yes [] No [X]		

7. Occupational Health and Safety Data

Please provide the name and contact details for your Health and Safety manager:		Marcin Kopron - Head of Occupational Health and Safety, email: marcin.kopron@grupaaazoty.com Tel. (+48) 81 565 2053			
	Direct employees	Contracted workers		Direct employees	Contracted workers

Number of man-hours worked in this reporting period:	5,222,855 hours	No data available	Number of fatalities ⁷ :	0	0
Budget spent on OHS in this period (total amount and currency):	PLN 13,005,649		Number of disabling injuries:	0	0
OHS training provided in this period in person-days:	Training held in 2023: induction training - 81 persons; blue-collar workers - 491 person-days; managers - 582 person-days (291 persons); administrative and office staff - 144 person-days	In 2023, 2,022 employees of third-party contractors working on GA ZAP's premises were trained (4 hours/day each).	Number of Lost Time Incidents (including vehicular):	24	0
Number of lost workdays resulting from incidents:	772	0	Number of cases of occupational disease:	1	0
Number of sick days:	51,555	31			
<p>Accident causes (falling from height, carrying heavy loads, struck by a falling object, contact with a flame or a hot/burning object/environment, etc.):</p> <p>In 2023, the accident causes included predominantly hazards related to moving about (tripping, slipping, etc.- 10 accidents), followed by exposure to dangerous process media and steam (6 accidents), mechanical hazards and physical strain (5 accidents), traffic (1 accident), and other causes unrelated to workplace hazards (4 accidents).</p>					
<p>Please provide details of any fatalities or major accidents that have not previously been reported to EBRD, including total compensation paid due to occupational injury or illness (amount and currency):</p> <p>No such occurrences</p>					

Please summarise any emergency prevention and response training that has been provided for Company personnel during the reporting period:

In 2023:

- 336 persons participated in periodic training for chemical rescue teams,
- 29 persons completed training for candidates for chemical rescue team members,
- 45 persons participated in training for operators of equipment isolating the respiratory tract (air systems),
- 2 persons commenced a professional qualification course for firefighting technicians,
- 10 persons completed training for firefighters,
- 2 persons commenced training for firefighters,
- these matters were also discussed during OHS training sessions,
- the following personnel received OHS training on emergency procedures, the use of gas masks, pre-medical first aid, evacuation procedures in case of an alarm signalling a chemical threat, and the rules of safe movement a total of 3,029 persons, including:
 - o blue-collar workers - 491 persons,
 - o managers - 291 persons,
 - o administrative and office staff - 144 persons,
 - o induction training - 81 persons;
 - o employees of third-party contractors - 2,022 persons.

Please summarise any emergency response exercises or drills that have been carried out during the reporting period:

In 2023, the following drills were performed:

- 75 chemical rescue drills with the participation of departmental chemical rescue teams and firefighters of the Company Fire Brigade,
- 16 tactical drills of the Company Fire Brigade at GA ZAP facilities, combined with a presentation of the facilities to State Fire Service teams of Puławy,
- twice during the year, loud tests of sirens on Grupa Azoty Puławy's premises, on the last Mondays of March and September.

8. Stakeholder Engagement

Please provide the name and contact details for your external relations or community engagement manager:

Paweł Wójcik, Head of Corporate Communication (Press Officer), email: pawel.wojcik@grupaazoty.com
Mobile phone: (+48) 81 565 21 76

Please provide information on the implementation of the Stakeholder Engagement Plan agreed with EBRD and summarise interaction with stakeholders during the reporting period, including:

- meetings or other initiatives to engage with members of the public or public organisations during the reporting period
- information on environmental protection, social policy and safety matters provided to the local community and other stakeholders during the reporting period:
- coverage in the media:
- interaction with any environmental or other community groups.

Please describe any changes to the Stakeholder Engagement Plan (SEP) agreed with EBRD:

- meetings or other initiatives to engage with members of the public or public organisations during the reporting period
- distribution of the newsletter presenting all key areas of the Company's and the Grupa Azoty Group's operations;
- content-related and financial support for environmental, patriotic and CSR programmes in local media outlets;
- performance of the patronage agreement with the Technical School Complex in Puławy,

under which Grupa Azoty PUŁAWY undertook to hire at least five of each year's school leavers;

- cooperation with the 'Responsible Care' Programme Secretariat with respect to initiatives undertaken by member companies;
- cooperation with the Honorary Blood Donors Club at Grupa Azoty PUŁAWY with respect to blood donation sessions,
- implementation of social outreach projects as part of the Grupa Azoty Employee Volunteering Programme,

- information on environmental protection, social policy and safety matters provided to the local community and other stakeholders during the reporting period;
- information on the Company's sponsorship and charitable giving activities;
- interviews with a representative of the Company's Management Board concerning various aspects of the Company's operations;
- updates on the fertilizer market and initiatives undertaken by Grupa Azoty Puławy;
- summary of the results of the blood donation drive run by the 'Gift of Life' Honorary Blood Donors Club at Grupa Azoty PUŁAWY;
- information on activities carried out as part of the employee volunteering competition;
- information on support provided to Voluntary Fire Brigades;

- coverage in the media:
 - company operating in challenging market conditions,
 - company involved in the region's community life (as a sponsor of sports, patron of culture etc.), responsible corporate citizen,
 - company looking for novel solutions based on research and development;
 - company undertaking investment projects to ensure its development and further optimal operation.

- Social dialogue
 - regular (at least quarterly) meetings between the employer and all trade unions active at the Company, during which information on key aspects of Grupa Azoty Puławy's operations is presented, and employee-related proposals and initiatives are discussed.

- Release of the Grupa Azoty Group's Integrated Report for 2022, prepared in accordance with the GRI and IIRC standards.

How many complaints or grievances did the project receive from members of the public or civil society organisations during the reporting period? Please split by stakeholder group. Summarise any issues raised in the complaints or grievances and explain how they were resolved:

No complaints were made with respect to the projects.

9. Community Development

Please summarise any social or community development / investment initiatives undertaken by the Company during the reporting period, and any associated expenditure:

An integral element of the Company's strategy is to support the development of local communities in the following areas:

Sports and healthy lifestyle

In its initiatives promoting sports and healthy lifestyles, Grupa Azoty Zakłady Azotowe Puławy S.A. supported both professional sportspeople, as well as associations of sports enthusiasts and amateurs. As regards professional sports, in 2021 the Company was engaged in partnerships with:

- ‘Azoty-Puławy’ Sports Club - handball champions playing in the PGNiG Superliga league, winners of six bronze medals in the Polish Handball Championship. In the 2022/2023 season, the team came 6th in the ranking table, in the current 2023/2024 season, it has advanced to the 5th position;
- ‘Wisła’ Puławy Sports Club - a multi-discipline club with a senior football team, which was promoted to the second league in the 2022/2023 season and ultimately came 5th in the 2022/2023 season; in the current 2023/2024 season, it is ranked 14th;
- Speedway Motor Lublin - a speedway team competing in the PGE Ekstraliga league, the 2022 and 2023 Champion of Poland,
- Padwa Zamość Handball Club - a handball club playing in the first central league; in the current 2023/2024 season, it is ranked 2nd;
- ‘LKPS LUBLIN’ - a volleyball club promoted to the Plus Liga league in 2022; In 2023, the team came 10th in the ranking table;
- CHKS Arka Chełm - a club promoted to Tauron 1 men’s league in the 2022/2023 volleyball season, and is currently ranked 3rd in the table.

In 2023, Grupa Azoty Zakłady Azotowe Puławy S.A. helped organise martial arts events, including Martial Sports Gala in Łęczna, and Bastion Fight Night Gala in Chełm.

Grupa Azoty Zakłady Azotowe Puławy S.A. also supported initiatives combining sports activities with the promotion of patriotic and civic attitudes: Bieg Tropem Wilczym (Wolf’s Trail) running event, Bieg Solidarności Lubelski Lipiec 1980 (Lublin Solidarity 1980) running event, and Bieg z Flagą o Puchar Marszałka Województwa Lubelskiego (Run with the Flag - the Lublin Province Marshal Cup) running event.

Education

Grupa Azoty Zakłady Azotowe Puławy S.A. consistently worked in support of the development of vocational education in partnership with the Marie Skłodowska-Curie Technical School Complex in Puławy. Under a patronage agreement, it provided job training opportunities to students.. The Company also undertook initiatives addressed to children and youth. It funded the prizes for students participating in art, literature and environmental competitions organised by local pre-schools and primary schools.

Culture

Grupa Azoty Zakłady Azotowe Puławy S.A. cooperated with the Dom Chemika Puławy Community Centre, Lublin Opera, Vistula Museum in Kazimierz Dolny, and established collaboration with the Czartoryski Family Museum in Puławy.

Grupa Azoty Zakłady Azotowe Puławy S.A. was again a strategic sponsor of the Festival of Folk Bands and Singers in Kazimierz Dolny, the ‘KULTuralia’ cultural event held as part of Student Culture Days, organised by the Catholic University of Lublin Foundation in Lublin, as well as a theatre and music show ‘In Love with Poland’ about the lives of women fighting for free Poland during World War II.

An important component of social and sponsorship activities is the support of initiatives cultivating and popularising Polish traditions and national identity. The events involving Grupa Azoty Zakłady Azotowe Puławy S.A. included the Mounted Rifles Festival in Hrubieszów, Festival of the 2nd Lublin

Territorial Defence Brigade named after major Hieronim Dekutowski, alias 'Zapora', in Lublin, and the Military and Patriotic Picnic.

Grupa Azoty Puławy also took part in a provincial harvest festival held by the Lublin Centre for the Meeting of Cultures at the Radawiec airfield and helped in the organisation of other events promoting the Company as a brand with close ties to Poland's rural areas and committed to their continuing development: a county harvest festival in Janowiec, Maliniaki Festival in Urzędów, and Gryczaki Festival in Janów Lubelski.

Charitable activities

The causes for which the Grupa Azoty Puławy Group companies can make donations are detailed in applicable regulations. Pursuing its Charitable Policy, the Company strives to do its best as a responsible employer, community member, and a good neighbour. Grupa Azoty Zakłady Azotowe Puławy S.A. supports initiatives focusing on the specific needs of both the city of Puławy and the entire Lublin region.

The initiatives supported by Grupa Azoty Zakłady Azotowe Puławy S.A. in 2023 involved mainly:

- culture, arts, and protection of cultural property and national heritage - Grupa Azoty Zakłady Azotowe Puławy S.A. took under its auspices the Wincenty and Franciszek Lessel Festival, and the Blacksmith Workshop and Blacksmith Arts Fair in Wojciechów. It supported a number of publications: the jubilee album commemorating the 25th anniversary of the Hola Fair, an album dedicated to the history of the parish of St. Joseph in Puławy, and the *Zeszyty Sandomierskie* regional periodicals. It also participated in the celebration of the 100th anniversary of the birth of the eminent sculptor Stanisław Strzyżyński;
- promotion of physical culture - Grupa Azoty Zakłady Azotowe Puławy S.A. provided financial support to local sports clubs for the purchase of costumes and sports equipment (MKS Ruch Ryki, KS Amator Leopoldów Rososz, KS Hetman Zamość), as well as to entities engaging the Company employees: Chemik Puławy Society for the Promotion of Physical Culture and the Company Branch of the Polish Tourist Association (organiser and promoter of tourism among the employees of Grupa Azoty Zakłady Azotowe Puławy S.A.);
- health protection and promotion - Grupa Azoty Zakłady Azotowe Puławy S.A. provided funding to the Gift of Life Honorary Blood Donors Club which promotes the idea of honorary blood giving in the county of Puławy. The Company supported the purchase of equipment for treatment rooms and offices at the renovated Ward of Children's Hematology, Oncology and Transplantology of the Children's University Hospital in Lublin; and extended annual assistance to employees and their families facing challenging financial and life circumstances due to health issues;
- safety of the local community - Grupa Azoty Zakłady Azotowe Puławy S.A. provided funding for the purchase of firefighting equipment and rescue and firefighting vehicles for voluntary fire brigades;
- preserving and promoting national traditions and Polish heritage - Grupa Azoty Zakłady Azotowe Puławy S.A. provided financial assistance to Rural Women's Associations to purchase equipment required for their activities, promotion of folk culture (e.g. to purchase traditional costumes), and organisation of local folk events such as Wilkołazy Boszcz Soup Festival and a harvest festival.

Environmental protection initiatives

In 2023, Grupa Azoty Zakłady Azotowe Puławy S.A.:

- engaged in looking after a peregrine falcon's nest - the Company works with local ornithologists in looking after the brooding nest located on the CHP plant flue gas stack - last

year, a new brood of peregrine falcon chicks hatched in the nest on the flue gas stack of the Puławy CHP plant,

- continued the Wildflower Meadow at Grupa Azoty Puławy project, aimed, among other things, at ensuring food for pollinating insects,
- maintained the practice of municipal waste segregation among employees on the premises of Grupa Azoty Puławy.

Community outreach initiatives

In 2023, activities undertaken by Grupa Azoty Zakłady Azotowe Puławy S.A. for the benefit of local communities included:

- collecting plastic bottle caps - at the request from the Puławy hospice. Dedicated collection boxes have been placed on the Company's premises for several years now. The caps brought by the Company's staff are collected by hospice employees several times a year.
- Grupa Azoty Puławy's team took part in the '(Nie) święci w piłkę grają' charity football tournament, organised by the Benedyktynski Zakątek Foundation. The purpose of the event was to raise funds for the completion of the sensory garden at the Revalidation and Education Centre in Puławy.
- As part of the Grupa Azoty Employee Volunteering Programme, the 'Green zone of comfort and relaxation - way to improve stress tolerance' project was implemented by employees. Objective: to create an open-air green zone of comfort and relaxation on the fenced premises of the National Education Board General Education School Complex No. 1 in Puławy for the school students and the local community. Employees of Grupa Azoty Puławy also worked to build a sensory path on the premises of the 'Inicjatywa' Therapy and Diagnosis Centre in Puławy. The sensory path was divided into sections corresponding to the senses of hearing, touch and sight. The entire facility is to serve young patients under the Centre's care who require early developmental support, among other things.
- Construction of three parking lots on land adjacent to the closed section of the plant. They are open-access facilities that may be used by employees, but also residents of the housing estate located near the plant, patients visiting the nearby clinic and other people who need to park in this part of the city. The construction of the parking lots with associated infrastructure (sidewalks and a bicycle path) has significantly improved traffic safety and connectivity. Moreover, the Company's Gift of Life Honorary Blood Donors Club organised regular blood donation drives.

ENVIRONMENTAL AND SOCIAL ACTION PLAN

Table 0.1 Wista Project, Grupa Azoty Poland - Environmental, Social, Health and Safety (ESHS) matters,
Updated (Alchemist Project)
Action Plan:

GRUPA AZOTY ZAKŁADY AZOTOWE PUŁAWY S.A.

No	Action	Environmental risks, liabilities/benefits	Legislative requirements/Best practice	Requirement/Resources	Scheduled completion - action to be completed by end of year	Target and evaluation criteria for implementation progress	Comments
3.	Actions required to achieve compliance with national EHS legal requirements and EU environmental standards - ZA Puławy						
3.1	Continue the upgrade of energy generation units to ensure future compliance with the BAT conclusions. Having completed stage 1 of the upgrade, ZA Puławy achieved 200mg/m ³ for SO ₂ and 20 mg/m ³ for PM. Plans for stage 2 of the upgrade of energy generation units to ensure compliance with the BAT conclusions for LCPs include upgrades of the Flue Gas Desulfurisation (FGD) Unit and of Steam Generator 2.	Reduce environmental impact as required by BAT conclusions for LCPs. As part of the BAT assessment and energy management systems, further potential for reducing carbon dioxide emissions is assessed.	Legislative requirements, best management practices, Bank's PRs	Investment needs	2020 Stage 2 of the upgrade of energy generation units 2022	Ensure that the project is updated in the annual report, selected technology and emission targets. Publish NTS of the project and provide copy/web link to the Bank as part of the annual report.	In December 2015, the second stage of construction of deNO _x units on Steam Generators 4 and 5 was completed. The selective non-catalytic reduction (SNCR) method allowed the Company to reduce NO _x emissions from Steam Generators 4 and 5 to 200 mg/m ³ . Three steam generators are subject to derogations. In Q4 2016, a decision was made to construct a catalytic deNO _x system for Steam Generator 2. 'Upgrade of OP-215 Steam Generator 2 to reduce NO _x emissions' investment project <ul style="list-style-type: none"> • Progress of work on Steam Generator 2 • basic engineering design approved;

No	Action	Environmental risks, liabilities/benefits	Legislative requirements/Best practice	Requirement/Resources	Scheduled completion - action to be completed by end of year	Target and evaluation criteria for implementation progress	Comments
							<ul style="list-style-type: none"> • design documentation prepared; • disassembly of Steam Generator 2 commenced; • delivery and assembly of key equipment (including SCR) contracted. <p>In 2020 and 2021, work was continued to upgrade Steam Generator 2 and the Flue Gas Desulfurisation Unit.</p> <p>In 2022, work was continued to upgrade Steam Generator 2 and the Flue Gas Desulfurisation Unit.</p> <p>The following work was performed to upgrade Steam Generator 2:</p> <ul style="list-style-type: none"> • The installation of the steam generator in the steam generator house was completed (confirmed by a successful pressure test). • The facade, walls and roof of the steam generator house were completed. • Switchgear upgrades for the upgraded Steam Generator K-2 were completed. • The installation of

No	Action	Environmental risks, liabilities/benefits	Legislative requirements/Best practice	Requirement/Resources	Scheduled completion - action to be completed by end of year	Target and evaluation criteria for implementation progress	Comments
							<p>auxiliary steam generator systems (pipelines, blowers, MEAK and cyclohexane systems, MEAK burners) was completed.</p> <ul style="list-style-type: none"> • Steam generator insulation and lining was completed. • Fitting of doors and windows in the building was completed. • The upgrade, commissioning and testing of the DCS system were completed. <p>The installation of electrical and I&C systems on the SCR reactor and WSC was completed.</p> <p>In 2023, the following work was performed to upgrade Steam Generator 2:</p> <ul style="list-style-type: none"> • acceptance tests, functional tests, mechanical dry runs and commissioning. • In September 2023, the final commissioning of the project took place. • The project was placed in service and warranty measurements were taken, • confirming the reduction

No	Action	Environmental risks, liabilities/benefits	Legislative requirements/Best practice	Requirement/Resources	Scheduled completion - action to be completed by end of year	Target and evaluation criteria for implementation progress	Comments
							<p>of NOx emissions on Steam Generator 2 to less than 130 mg/Nm³.</p> <p>In 2023 and 2024, the following work was performed to upgrade the Flue Gas Desulfurisation Unit:</p> <ul style="list-style-type: none"> • During the facility's shutdown from 31 July to 30 October 2023, A-201 Absorber and the flue gas duct connecting A-201 Absorber with the flue gas stack were upgraded. • A new T-215 circulation tank was constructed. • Two additional P-215 A/B Circulation Pumps were purchased and installed. • New piping for the T-215 Tank - P-215 A/B Circulation Pumps - A-201 Absorber assembly was fabricated and installed together with the required fittings. • On 15 February and 16 February 2024, during a shutdown of the Flue Gas Desulfurisation Unit, the newly designed T-215 Tank - P-215 A/B Circulation

No	Action	Environmental risks, liabilities/benefits	Legislative requirements/Best practice	Requirement/Resources	Scheduled completion - action to be completed by end of year	Target and evaluation criteria for implementation progress	Comments
							<p>Pumps - A-201 Absorber assembly (fifth spraying set) was incorporated to enhance the desulfurisation process.</p> <ul style="list-style-type: none"> In February/March 2024, mechanical dry runs and commissioning were performed to test the newly constructed system for the FGD Absorption section. In March 2024, warranty measurements of the guaranteed emission parameters were performed, an operating permit for the upgraded Flue Gas Desulfurisation Unit was obtained, the final commissioning work was completed, and the upgraded unit was placed in service. The warranty measurements confirmed the reduction of SO₂ and PM emissions to a level below applicable limits.
3.2	Upgrade the WWTP/construct a new WWTP	Reduce environmental impact as required by IED;	Legislative requirements, best management	Investment needs	2015-2026, as required by relevant authorities:	Obtain a permit to operate the new facility Ensure progress update in	In November 2017, a study was prepared covering the management and discharge of all wastewater streams

No	Action	Environmental risks, liabilities/benefits	Legislative requirements/Best practice	Requirement/Resources	Scheduled completion - action to be completed by end of year	Target and evaluation criteria for implementation progress	Comments
			practices, Bank's PRs			the annual report.	<p>generated on the Company premises. The concept will serve as the basis for selecting a contractor to design and construct the Central Biological Wastewater Treatment Plant.</p> <p>In 2018, a contractor was selected to perform specific tasks for the 'Design and construction of the Central Biological Wastewater Treatment Plant' project and an invitation to tender was issued to select a contractor for the 'Design and construction of the Central Biological Wastewater Treatment Plant' project.</p> <p>In 2020, work was continued to select a contractor for the design and construction of a central biological industrial wastewater treatment plant. As part of the work, laboratory and pilot tests were launched on discharged wastewater streams to select an appropriate treatment</p>

No	Action	Environmental risks, liabilities/benefits	Legislative requirements/Best practice	Requirement/Resources	Scheduled completion - action to be completed by end of year	Target and evaluation criteria for implementation progress	Comments
							<p>technology. Once completed, the project will enable the Company to meet the requirements defined in BAT conclusions for common wastewater treatment systems.</p> <p>In 2021, laboratory tests were continued and tender documentation was prepared.</p> <p>In 2022, phase 2 of the work was under way. In September 2022, the ToR/functional programme were communicated to bidders selected in the first stage of the proceedings. Reference visits were made to treatment plants completed by a bidder.</p> <p>In 2023, phase 2 of the work was continued. After the ToR/functional programme were delivered to bidders selected in the first stage of the proceedings, further reference visits were made to treatment plants completed by a bidder. Work was under way to evaluate process-related and engineering aspects of the</p>

No	Action	Environmental risks, liabilities/benefits	Legislative requirements/Best practice	Requirement/Resources	Scheduled completion - action to be completed by end of year	Target and evaluation criteria for implementation progress	Comments
							technical proposal, feedback was provided on the proposed solutions, and requests were made to clarify and complement the content, e.g. with respect to electrical, mechanical and instrumentation solutions.
3.3	Prepare a plan (including budget) and conduct soil and groundwater surveys.	Reduce environmental impact as required by IED. This will enable assessment of baseline conditions and identification of potential receptors (both human and ecological).	Legislative requirements, best management practices, Bank's PRs	Internal and external	Ongoing	Report on soil and groundwater status	In 2017, an addendum to the baseline report was drawn up. The study involved a comparison of historical soil contamination data gathered through 2013-2014 surveys against currently applicable limits set down in the 2016 regulations. No soil contamination was identified on the Company premises. In 2020, the condition of groundwater was inspected, with no contamination found. In 2021, the condition of groundwater was inspected, with no significant deterioration in quality found relative to the values specified in the Baseline Report.
3.4	Review nitrate pollution data covering wooded areas	This will enable appropriate assessment of	Best practice	Own resources	Completed	Provide report (Report on the historical impact of	A decrease of nitrate concentration in groundwater was recorded.

No	Action	Environmental risks, liabilities/benefits	Legislative requirements/Best practice	Requirement/Resources	Scheduled completion - action to be completed by end of year	Target and evaluation criteria for implementation progress	Comments
	near the plant. Summarise it in a report that assesses historical, present and future impacts and determines whether the existing monitoring arrangements are adequate.	potential environmental issues related to historical off-site nitrate pollution.				emissions, remedial actions and current monitoring was submitted in February 2016)	Report on the historical impact of emissions, remedial actions and current monitoring was submitted in February 2016.

1. Information about the Company	
Company Name:	Grupa Azoty Zakłady Azotowe Kędzierzyn S.A.
Company Address:	47-220 Kędzierzyn-Koźle; ul. Mostowa 30 A; P.O. Box 163
Country:	Poland
Town/Location:	Kędzierzyn-Koźle
Company authorised representative:	Artur Kopec
I certify that the data contained in this report completely and accurately represents the Company's operations during the reporting period.	
Signature:	
Title: Vice President of the Management Board - Director General Date: 30 April 2024	
Contact Details:	
Telephone: (+48) 77 481 29 00	
Mobile: -	
Email: artur.kopec2@grupazoty.com	

Please provide key data on the Company performance, as well as production levels at each plant. For each of the 7 large plants please provide:

Item (PLN '000)	Cumulative	
	2022	2023
Revenue	4,680,815	2,059,541
Profit/(loss) on sales	866,782	(381,099)
EBIT	578,970	(565,492)
EBITDA	695,626	(423,167)
Net profit/(loss)	491,817	(495,941)

Key performance indicators (KPIs) in terms of energy consumption, emissions, use of natural resources, and carbon dioxide emissions:
See Section 4 and Section 5.

Number of staff employed and any change in employment over past 3 years

	As at 31 Dec 2021	As at 31 Dec 2022	As at 31 Dec 2023
Number of direct employees:	1,562	1,589	1,565
Number of contracted workers:	-	-	-

Other information in Section 6.

Provide information on permits and each subsidiary's compliance status with IPPC/IED (*Integrated Pollution Prevention and Control Directive/Industrial Emissions Directive*)

In 2023, Grupa Azoty ZAK S.A. continued to work on clearing the legal status of its operations with respect to environmental protection requirements.

A number of decisions were obtained, including:

- an amendment to the integrated (IPPC) permit for the fuel combustion installation to include the 82.8 MWt gas-fired steam generator currently under construction,
- consolidated and amended texts of the integrated (IPPC) permits for the Agro Business Unit and Energy Business Unit installations,
- a new decision of the Opole Province Marshal confirming compliance with the conditions for classification of fly ash as a by-product,
- a decision of the Opole Province Marshal deferring the payment date of the increased environmental fee in 2022 for the fuel combustion installation,
- a decision of the Provincial Inspector for Environmental Protection in Opole setting the deadline for remedying a violation related to the operation of old steam generators,
- two decisions granting permission to remove trees from the Company's land.

With regard to participation of the Company's installations in the emissions trading scheme:

- In March 2023, two annual reports on the 2022 volumes of greenhouse gas emissions (from the ZAK Spółka Akcyjna and CHP plant installations) were positively verified;
- In March 2023, the reports on the 2022 activity levels for the CHP plant and ZAK Spółka Akcyjna installations were positively verified; and used as the basis for further arrangements concerning the allocation of free emission allowances to the Company's installations for 2023;
- In March 2023, emission allowances corresponding to the following emission volumes presented in the verified reports for 2022 were redeemed: CHP plant installation: 325,544 t CO₂(e), ZAK Spółka Akcyjna installation: 751,729 t CO₂(e); the emissions were redeemed using also purchased allowances;
- In October 2023, a decision was obtained to grant financial compensation to the Company for the cost of emission allowances passed on to the prices of electricity used to manufacture products in energy-intensive sectors or subsectors; Such compensation is intended to enhance the competitiveness of energy-intensive industries and offset the effect of higher prices of CO₂ emission allowances on the cost of electricity;
- In April 2023 903,532 EUAs were credited to the EU emission allowance accounts, while in December 2023 the activity level report was approved, leading to an adjustment to the allowance allocation, as a result of which 11,161 surplus EUAs for 2023 were surrendered in January 2024.

Below are presented environmental decisions currently held by Grupa Azoty ZAK S.A.

Integrated (IPPC) permits:

- I. Units for the production of synthesis gas, aldehydes and alcohols, di-2-ethylhexyl terephthalate (with a batch production system) and special esters production units** - Decision of the Marshal of the Opole Province, Ref. No. DOŚ-III.7222.35.2019.AK of 6 April 2020 - consolidated and amended text of the integrated permit: Administrative ruling No. DOŚ-III.7222.31.2020.AK of 26 May 2020 and DOŚ-III.7222.17.2021.HM of 21 February 2022.
- II. Ammonia production units (including a synthesis gas compressor station), TK IV and TK V nitric acid, calcium ammonium nitrate, urea, and liquid fertilizers production units** - Decision of the Marshal of the Opole Province, Ref. No. DOŚ-III.7222.36.2021.HM of 30 January 2023 - consolidated and amended text of the integrated permit.
- III. Fuel combustion unit and non-hazardous waste storage facility** - Decision of the Marshal of the Opole Province, Ref. No. DOŚ-RPŚ.7222.8.2023.MWr of 31 August 2023 - consolidated and amended text of the integrated permit.
- IV. Industrial wastewater treatment facility** - Decision of the Marshal of the Opole Province, Ref. No. DOŚ.7222.12.2015.AK of 30 June 2015 - as amended by: Decision Ref. No. DOŚ.722242.2016.NG of 24 October 2016; Decision Ref. No. DOŚ-III.7222.79.2017.AK of 30 March 2018; Decision Ref. No. DOŚ-III.7222.43.2019.AKa of 16 January 2020; Decision Ref. No. DOŚ-III.7222. 57.2020.AKa of 1 July 2021; Administrative ruling No. DOŚ-III.7222.38.2021.AKa of 21 September 2021.

Water-law permit:

- Decision of the Governor of the Opole Province, Ref. No. ŚR.III-MJP-6811-179/05 of 14 March 2006 – water-law permit for water withdrawal, as amended by: ŚR.II-MJP-6811-13/07 of 21 May 2007; GL.RUZ.421.148.2018.TS of 25 September 2018;
- Decision of the Governor of the Opole Province, Ref. No. ŚR.III-MK-6811/19/02 of 16 May 2002 - decision establishing a direct protection zone for wells drawing water from Tertiary and Quaternary formations.

Other decisions:

- Decision of the Marshal of the Opole Province, Ref. No. DOŚ-RPŚ.7245.2.2.2022.JW of 28 April 2023 – classifying fly ash as a by-product;
- Decision of the Marshal of the Opole Province, Ref. No. DOŚ.III.7241.2.9.2013.MK of 26 February 2014 - decision approving the ash and slag landfill operation manual.

Remediation:

- Decision Ref. No. WOOŚ.511.1.2.2016.ER.10 of 8 May 2017 concerning a remediation plan for legacy land surface contamination at the site of the Central Mechanical and Biological Wastewater Treatment Facility (area between the sewage sludge landfill and pond 3);
- Decision Ref. No. WOOŚ.511.1.6.2016.ER.7 of 26 May 2017 concerning a remediation plan for legacy land surface contamination at the site of the former Copper-Based Syngas Cleaning Unit II (Field E-5), as amended by: Decision Ref. No. WOOŚ.515.13.2018.ER.4 of 8 August 2018;
- Decision Ref. No. WOOŚ.511.1.2018.MO.6 of 27 July 2018, agreeing the conditions of remedial activities covering land at facility 861;
- Decision Ref. No. GL.RUZ.4210.164.2021.AK of 18 November 2021 granting a water-law permit for restoration of groundwater as part of land remediation work at facility 861.

Greenhouse gas emissions:

- Environmental permit No. DOŚ-III.7225.20.2016.BG of 25 November 2016 - permit for greenhouse gas emissions from a fuel combustion installation with a rated thermal power of 516.1 MWt, as amended by: DOŚ-III.7225.16.2017.BG of 24 November 2017; DOŚ-III.7225.42.MWr of 12 October 2020; DOŚ-III.7225.47.2021.BG of 18 February 2022;
- Environmental permit No. DOŚ-III.7225.25.2016.BG of 23 January 2017 – permit for greenhouse gas emissions from the TKIV and TKV nitric acid, ammonia, synthesis gas, aldehyde and alcohols production installations, as amended by: DOŚ-III.7225.1.2018.NG of 21 March 2018; DOŚ-III.7225.7.2019.MWr of 22 July 2019; Administrative ruling No. DOŚ-III.7225.7.2019.MWr of 12 August 2019; DOŚ-III.7225.44.2020.BG of 10 March 2021; DOŚ-III.7225.48.2021.BG of 11 March 2022;
- Decision Ref. No. DOŚ-III.7225.25.2019.BG of 28 January 2020 approving the monitoring methodology plan (CHP plant installation), as amended by: DOŚ-III.7225.32.2020.BG of 24 July 2020;
- Decision Ref. No. DOŚ-III.7225.26.2019.BG of 5 February 2020 approving the monitoring methodology plan (ZAK Spółka Akcyjna installation), as amended by: DOŚ-III.7225.31.2020.BG of 25 August 2020; DOŚ-III.7225.6.2021.BG of 15 March 2021; DOŚ-RPŚ.7225.3.2022.BG of 18 May 2022.

Reporting period: 2023

2. General information		
Is the project materially compliant with all relevant EBRD Performance Requirements (taking account of agreed action plans, exemptions or derogations)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	If NO, please provide details of any material non-compliances:
Is the project materially compliant with all applicable environmental and social laws and regulations?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	If NO, please provide details of any material non-compliances:
Have there been any accidents or incidents that have caused damage to the environment, brought about injuries or fatalities, affected project labour or local communities, affected cultural property, or created liabilities for the company?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<p>If YES, please describe, including details of actions to remedy and prevent reoccurrence:</p> <p>In 2023, there were no accidents or incidents at Grupa Azoty that caused damage to people and the environment, local communities or cultural property.</p> <p>There was one major technical failure affecting the operation of the entire plant: overheating of the outer shell at the process gas inlet of the Ammonia Department's E-102 boiler following a rupture in the refractory lining, resulting in an increase of the outer shell temperature and the need to take the unit offline (for safety reasons), with subsequent shutdown of dependent units (due to a lack of production inputs).</p> <p>The failure was remedied by replacing the damaged material and provision of a new lining made from properly selected and tested refractory materials, meeting the requirements of the boiler's operating conditions.</p> <p>In order to prevent reoccurrence, the system documents related to the process operation were revised with respect to temperature control of the boiler unit's outer shell and cracker, temperature sensors were mounted in potential overheat areas transmitting data to the DCS and alarm parameters were set.</p>
Have there been any changes to environment, social, labour or health and safety laws or regulations that have materially affected the Company?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	If YES, please describe:

<p>How many inspections did you receive from the environmental authorities during the reporting period?</p>	<p>Number: 4</p>	<p>Please provide details of such inspections, including the number and nature of any violations found:</p> <p>In 2023, two inspections related to environmental protection were carried out at Grupa Azoty ZAK S.A. by the Opole Provincial Inspectorate for Environmental Protection (WIOŚ):</p> <ul style="list-style-type: none"> a) unscheduled inspection carried out on 19 January 2023 - 3 March 2023 at the request of the Opole Province Marshal Office to check compliance with the requirements for classification of fly ash from the fuel combustion unit as a by-product (as part of the review of a relevant application submitted by Grupa Azoty ZAK S.A.); b) unscheduled inspection carried out on 31 March 2023 - 25 April 2023 covering the 'Upgrade of partial combustion unit at the Ammonia Department' project in connection with its completion and planned commissioning; c) unscheduled emergency inspection carried out on 23 June 2023 - 19 July 2023 to check compliance with the conditions specifying the quantity and quality of effluents discharged to the Oder River; d) scheduled inspection carried out on 19 July 2023 - 13 December 2023 covering certain general issues at the Company (including prevention of major industrial accidents, implementation of requirement notices issued after earlier inspections) and compliance with the conditions of integrated (IPPC) permits. <p>During the last inspection, certain violations of the conditions of the integrated permit for the fuel combustion unit were identified, resulting in the issuance of a requirement notice.</p> <p>In response, the Company provided information on the implemented and ongoing measures to eliminate the identified violations.</p>
<p>How many inspections did you receive from the health and safety authorities during the reporting period?</p>	<p>Number: 2</p>	<p>Please provide details of such inspections, including the number and nature of any violations found:</p> <p>In 2023, one inspection was carried out by the Office of Technical Inspection.</p> <p>In 2023, one inspection of the National Atomic Energy Agency was carried out by the Nuclear Materials Inspection Engineer.</p>

How many inspections did you receive from the labour authorities during the reporting period?	Number: 1	Please provide details of such inspections, including the number and nature of any violations found: Between 19 December 2022 and 13 January 2023, the National Labour Inspectorate carried out an inspection to check compliance with OHS and working time regulations.
Have these visits resulted in any penalties, fines and/or corrective action plans?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	If YES, please describe, including status of implementing corrective actions to address any violations found: Following the latest inspection, a sanction was administered in the form of an instruction to be followed by the inspected party. As a result of inspections covering the other areas, no fines or other penalties were imposed on the Company and no corrective action plans were required.
Has the Company engaged any contractors for project-related work in the reporting period?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	If YES, please state for which types of work, and how the Company has monitored the compliance of contractors with EBRD Performance Requirements and the Environmental and Social Action Plan: The Company engaged external contractors for the following types of work: – development of project documentation, – demolition and disassembly work (decommissioning of idle pipelines, buildings and structures), – construction and repair work, – collection of waste generated by the plant (including complete oil and lubrication service of plant and equipment). The work of subcontractors was monitored through: – ongoing supervision of work, – ongoing OHS inspections, – work acceptance reports and waste transfer notes in the Waste Database (BDO).
Were any of the violations stated above the responsibility of contractors?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	If YES, please provide details, including how the Company is ensuring that corrective actions are implemented by the contractor?
Have any operations been reduced, temporarily suspended or closed down due to environmental, health, safety or labour reasons?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	If YES, please describe:
Please describe any environment or social programmes, initiatives or sub-projects undertaken during the reporting period to improve the Company's environmental or social performance and/or management systems: As regards the Company's management systems, including the environmental management system, in March 2023 Polski Rejestr Statków S.A. (Polish Shipping Register) conducted an audit at Grupa Azoty ZAK S.A. resulting in renewal of the integrated management system certificate, confirming conformity of the implemented and maintained system with the following standards: ISO 9001:2015 (quality), ISO 14001:2015 (environment), ISO 45001:2018 (OHS) and ISO 50001:2018 (energy management). Certificate No. NC-3312 is valid through 13 February 2026.		

Work was continued to further improve the integrated management system in line with a set of general and specific objectives and the system was subject to internal audits.

The 'Principles for the identification of environmental aspects' were updated taking into account the potentials identified during an external audit and changes in the organisational structure. The rules for the identification and assessment of environmental aspects at individual organisational units were updated on an ongoing basis.

In 2023, the Company engaged in activities designed to achieve specific objectives of the environmental protection management system, as well as tasks undertaken under the Responsible Care® Programme, the most important of which were:

- 1) implementation of projects related to the adopted steam policy at Grupa Azoty ZAK S.A., which will result, among others, in lower demand for electricity/steam needed to carry out technological processes (especially in ammonia production) and partial replacement of coal for the production of steam with gas by building a peak-load/reserve boiler house with a 100 Mg/h gas-fired steam generator; as part of these activities, photovoltaic systems are also being built on Grupa Azoty ZAK S.A.'s premises under the Green Azoty strategy;
- 2) remediation work carried out on the site of the former maleic acid anhydride production unit by facility no. 861 - the remediation, carried out using the in situ method, along with the monitoring of the pollution status of the site will be performed until 2027;
- 3) optimisation of special ester units;
- 4) improvement of staff safety at a number of units through proper OHS and fire prevention measures;
- 5) implementation of ten health promotion projects for employees and their children during which 1,356 people were examined.

Please indicate the level of associated expenditure (capital expenditure and operating expenditure), and whether this relates to the requirements of the Environmental and Social Action Plan, or to any other initiative:

Expenditure on the implementation of the planned activities was as follows:

- expenditure on specific environmental protection objectives in 2023 - approximately PLN 60.71m;
- expenditure on activities undertaken as part of the Responsible Care Programme in 2023 - approximately PLN 4.16m.

3. Status of the Environmental and Social Action Plan

Please provide information on the status of each item in the Environmental and Social Action Plan(ESAP) agreed with EBRD. If the ESAP was updated during the reporting period, please attach a copy of the new plan.

The table is attached hereto.

4. Environmental Monitoring Data for each of the key subsidiaries

The information required in this section can be extracted from a CSR report, or a full CSR report can be attached.

Please provide the name and contact details for your environmental manager:			Joanna Maj - Head of Environmental Protection Office Telephone: (+48) 77 481 21 03 Mobile: (+48) 695 380 998 Email: joanna.maj@grupaazoty.com	
Parameter ²	Amount ³	Unit	Compliance Status ⁴	Comments ⁵
Wastewater				
Total wastewater	6,454.6	'000 m ³	compliant	Aggregate wastewater stream
Biochemical Oxygen Demand(BOD5)	38.7	Mg	compliant	same as above

Chemical Oxygen Demand(COD)	320.6	Mg	compliant	same as above
Suspended solids	108.0	Mg	compliant	same as above
Phosphorus	1.3	Mg	compliant	same as above
Heavy metals	0.655	Mg	compliant	same as above
[Other]				
Ammoniacal nitrogen	5.2	Mg	compliant	same as above
Total nitrogen	72.5	Mg	compliant	same as above
Air emissions				
SO ₂	687.3	Mg	compliant	emissions (mainly from the CHP plant)
Nitrogen oxides (NO _x)	486.8	Mg	compliant	aggregate emissions from the CHP plant and chemical units
Particulates	94.4	Mg	compliant	same as above
CO ₂	538,490.1	Mg	compliant	same as above
Other parameters				
Noise emissions	In 2023, periodic tests of environmental noise levels were performed for the Company's production units. Measurements carried out at Grupa Azoty ZAK S.A. confirmed compliance with the permitted noise levels in areas abutting residential zones protected from noise pollution.			
[Other]	-	-	-	-
Total solid waste including:	39,985.0	Mg	compliant	amount of solid waste
06 13 02* activated carbon	23.5	Mg	compliant	urea, syngas and aldehyde post-production waste
07 01 08* still bottoms and reaction residues	693.6	Mg	compliant	aldehyde post-production waste
07 01 10* filter cakes	140.5	Mg	compliant	ester post-production waste
07 01 11* sludges from wastewater pre-treatment	20.1	Mg	compliant	alcohol post-production waste
10 01 01 slag, bottom ash	2,987.8	Mg	compliant	waste from on-site CHP plant
10 01 02 fly ash	8,479.0	Mg	compliant	waste from on-site CHP plant
10 01 80 ash and slag mixtures	19,781.1	Mg	compliant	waste from on-site CHP plant
10 01 82 mixtures of ash and desulfurisation waste	3,747.8	Mg	compliant	waste from on-site CHP plant
15 02 02* absorbents, wiping cloths contaminated by hazardous substances	86.0	Mg	compliant	aggregate waste stream
16 08 02* spent catalysts containing hazardous transition metals	36.4	Mg	compliant	ammonia and syngas post-production waste

17 04 05 iron and steel	1,310.6	Mg	compliant	aggregate waste stream
19 08 01 screenings	448.4	Mg	compliant	waste from treatment of aggregate wastewater stream
19 08 10* grease and oil mixture from oil/water separation	24.8	Mg	compliant	waste from treatment of aggregate wastewater stream
19 08 11* sludges from biological treatment of industrial wastewater	2,004.7	Mg	compliant	waste from treatment of aggregate wastewater stream
19 08 13* sludge from non- biological treatment of wastewater	52.2	Mg	compliant	waste from treatment of aggregate wastewater stream

Please provide details of the types and amounts of solid wastes generated by the project. Indicate where wastes are classified as hazardous. Indicate the final re-use, recycle or disposal method for each waste type.

In 2023, there were no projects at Grupa Azoty ZAK S.A. in which demolition work contractors would generate (under relevant contracts) demolition debris or asbestos-containing materials, and therefore no such waste was generated and there was no need to take any measures to further manage such waste.

5. Resource Usage and Product Output

Parameter	Amount	Measurement Unit	Comments ⁶
Fuels used			
Crude oil	-	-	-
Natural gas	2,217,873	MWh	ammonia production
Hard coal	140,584	Mg	coal parameters: calorific value - 21,792 kJ/kg, sulfur content - 0.59%, ash content - 19.22%.
Lignite	-	-	-
Grid electricity	525,023	MWh	total volume of electricity purchased for Grupa Azoty ZAK S.A. - both for in-house needs as an end user and for resale as part of the electricity trading business.
Heat purchased from external sources	16,492	GJ	-
Feedstocks and raw materials used			
Propylene	45,744	Mg	for alcohol and aldehyde production
Ammonia	4,645	Mg	for nitric acid production
Terephthalic acid	11,858	Mg	for Oxoviflex plasticizer production
Oxygen	136,177	'000 m ³	figure covers all plant operations
Nitrogen	150,647	'000 m ³	figure covers all plant operations
Dolomite	46,330	Mg	for dolomite powder production unit
Product output			
Anhydrous ammonia	217,760	Mg	
Gaseous carbon dioxide	124,629	Mg	
Technical-grade nitric acid	340,225	Mg	
Ammonium nitrate solution	379,866	Mg	

Miksal	1,450	Mg	
ZAKsan®	222,200	Mg	
Total Salmags, including:	150,040	Mg	
Salmag®	142,010	Mg	
Salmag z magnezem® (Salmag with magnesium)	-	-	
Salmag z borem® (Salmag with boron)	8,030	Mg	
Salmag z siarką® (Salmag with sulfur)	-	-	
28% UAN	13,434	Mg	
UAN 30%	8,686	Mg	
32% UAN	101,213	Mg	
UAN S 28-5	3,007	Mg	
Total urea, including:	78,974	Mg	
- Urea-based lyes	78,974	Mg	
46% granulated urea	4,188	Mg	
33% PULNO _x ®	-	-	
40% PULNO _x ®	18,489	Mg	
45% PULNO _x ®	726	Mg	
NOXy® (AdBlue®)	93,982	Mg	
LIKAM®	6,386	Mg	
WGS1 synthesis gas	473,358	'000 m ³	
WGS2 synthesis gas	46,340	'000 m ³	
Isobutyl aldehyde	430	Mg	
n-butyl aldehyde	3,518	Mg	
Total OXO alcohols, including:	62,108	Mg	
2-Ethylhexanol	47,249	Mg	
Isobutanol	3,369	Mg	
n-butanol	11,490	Mg	
Octanol F	2,288	Mg	
Oxoviflex®	27,780	Mg	
Mix of plasticizers	-	-	
Oxofine™ DOA	246	Mg	
Oxofine™ DBT	41	Mg	
Oxofine TOTM	313	Mg	
Oxofine™ POLY2k	3	Mg	
Oxofine bio DOS	-	-	
Instrument air	68,794	'000 m ³	
Heat	3,073,000	GJ	
Electricity	52,492	MWh	

6. Human Resources management			
Please provide the name and contact details for your Human Resources manager:		Radosław Miązek - Head of the Management and Human Resources Department Telephone: (+48) 77 481 34 60 Mobile: +48 723 187 161 Email: radoslaw.miazek@grupazoty.com	
	Total	Hired in this reporting period	Terminated in this reporting period
Number of direct employees:	1,565	101	125
Number of contracted workers:	-	-	-
Were there any collective redundancies during the reporting period?	Yes [] No [X]	If YES, please describe the redundancy plan, including reasons for redundancies, number of workers involved, how they were selected, consultation undertaken, and measures to mitigate the effects of redundancy. -	
Are any redundancies to the workforce planned for the next year?	Yes [] No [X]	If YES, please describe the redundancy plan, including reasons for redundancies, number of workers involved, and selection and consultation process: -	
Were there any changes in trade union representation at Company plants during the reporting period?	Yes [] No [X]	If YES, please provide details, and summarise engagement with trade unions during the reporting period: -	
Were there any other worker representatives (e.g. in the absence of a trade union)?	Yes [] No [X]	If YES, please provide details and summarise engagement with them during the reporting period: -	
Were there any changes in the status of Collective Agreements?	Yes [] No [X]	If YES, please provide details: -	
Have employees raised any grievances with the project during the reporting period?	Yes [X] No []	If YES, please state how many, split by gender, summarise the issues raised in grievances by male and female staff and explain how the Company has addressed them: In 2023, one conciliation proceeding was pending at Grupa Azoty ZAK S.A. initiated at an employee's request. The applicant was a woman seeking change of the employment termination procedure and a severance payment. The conciliation ended with the change of the employment termination procedure as requested by the employee.	
Have employees raised any complaints about harassment or bullying during the reporting period?	Yes [] No [X]	If YES, please state how many, split by gender, summarise the issues raised by male and female staff and explain how the Company has addressed them: -	
Have there been any strikes or other collective disputes related to labour and working conditions at the Company in the reporting period?	Yes [] No [X]	If YES, please summarise nature of, and reasons for, the disputes and explain how they were resolved: -	
Have there been any court cases related to labour issues during the reporting period?	Yes [X] No []	If YES, please summarise the issues contested and outcome: There were disputes over labour issues involving three employees. The proceeding involving one employee ended with a settlement (the settlement covered four cases), while two cases brought by two employees were pending.	
Have there been any changes to the following policies or terms and conditions during the	Yes [X] No []	If YES, please give details, including of any new initiatives: In 2023, two Supplements to the Collective Bargaining	

reporting period in any of the following areas: <ul style="list-style-type: none"> - Trade union recognition - Collective Agreements - Non-discrimination and equal opportunities for all - Equal pay for equal work - Gender equality - Bullying and harassment, including sexual harassment - Employment of young workers under 18 - Wages and salaries (for regular and overtime hours) - Overtime - Working hours - Flexible working / work-life balance - Grievance mechanism for workers - Health & safety 		Agreement were executed. The Supplements concerned: <ul style="list-style-type: none"> • change in the percentage value defined in the Base Pay and Shift Allowance Table, • changes in percentage salary ranges for trade union chairs, persons sitting on the Trade Unions Board, and person holding the position of Social Labour Inspector at the Company, • change of the amount of basic contribution to the Company Social Benefits Fund. A provision was added to the Work Rules allowing shift employees to leave the workplace earlier, and the Rules of Remote Work were implemented. No other changes were made.
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7. Occupational Health and Safety Data					
Please provide the name and contact details for your Health and Safety manager:		Marcin Trochimowicz, Head of Occupational Health & Safety Telephone: (+48) 77 481 22 53 Mobile: (+48) 695 380 826 marcin.trochimowicz@grupaaazoty.com			
	Direct employees	Contracted workers		Direct employees	Contracted workers
Number of man-hours worked in this reporting period:	2,459,456	-	Number of fatalities ⁷ :	0	-
Budget spent on OHS in this period (total amount and currency):	PLN 2,525.66 thousand	-	Number of disabling injuries:	0	-
OHS training provided in this period in person-days:	1,381	-	Number of Lost Time Incidents (including vehicular):	10	-
Number of lost workdays resulting from incidents:	685	0	Number of cases of occupational disease:	0	-
Number of sick days:	30,348	-	-	-	-
Accident causes (falling from height, carrying heavy loads, struck by a falling object, contact with a flame or a hot/burning object/environment, etc.): <ul style="list-style-type: none"> • fall from height, • slipping, • striking against a protruding object, • contact with corrosive medium. 					
Please provide details of any fatalities or major accidents that have not previously been reported to EBRD, including total compensation paid due to occupational injury or illness (amount and currency): No such occurrences					
Please summarise any emergency prevention and response training that has been provided for Company					

personnel during the reporting period:

Employees of Grupa Azoty ZAK S.A. receive emergency prevention and response training during periodic OHS instructions in compliance with the P-03/C Training procedure.

The Chemical Rescue Division also addresses these topics while training Grupa Azoty ZAK S.A.'s Departmental Chemical Rescue Team. 24 scheduled training sessions for the Departmental Chemical Rescue Team and 16 drills at designated departments were held. These were complemented by one-day drills organised by the State Fire Service.

Please summarise any emergency response exercises or drills that have been carried out during the reporting period:

The drills (see above) were intended to check the preparation of the plant for the performance of tasks under the Internal and External Emergency Plans. The drills, held outdoors, were attended by employees from each Department, the Rescue Unit of the Chemical Rescue Division, the Departmental Chemical Rescuers Team, Gwarant (a security services provider), PZU Życie (a healthcare provider), and Company Shift Dispatchers. In addition, a trial evacuation of three buildings, involving more than 50 staff, was held (after prior notification of the State Fire Service). At noon on the first Tuesday of each month, a Company Shift Dispatcher announced a second degree drill alarm in accordance with the rules adopted at the Company. Company Shift Dispatchers also ran operating tests of the emergency channel (the most important means of communication during rescue operations at Grupa Azoty ZAK S.A.).

8. Stakeholder Engagement

Please provide the name and contact details for your external relations or community engagement manager:

Iwona Drozdowicz-Tomaszek
acting Head of the Communication and CSR Office
Telephone: (+48) 77 481 30 20
Email: iwona.drozdowicz@grupaazoty.com

Please provide information on the implementation of the Stakeholder Engagement Plan agreed with EBRD and summarise interaction with stakeholders during the reporting period, including:

- meetings or other initiatives to engage with members of the public or public organisations during the reporting period
- information on environmental protection, social policy and safety matters provided to the local community and other stakeholders during the reporting period:
- coverage in the media:
- interaction with any environmental or other community groups.

Please describe any changes to the Stakeholder Engagement Plan(SEP) agreed with EBRD.

The Company takes care to ensure clarity and consistency in communicating with its market environment, local community and the media. All material events and activities are announced by the Company through the media by maintaining contacts with the press, issuing press releases and getting coverage in the media. The Company has in place a coherent visual identity system and advertising design ensuring that it is easily recognisable in advertising and promotional materials, as well as in contacts with the media and stakeholders.

In its dialogue with stakeholder groups, the Company relies on a mix of available communications tools:

- Employees: Intranet of Grupa Azoty Zakłady Azotowe Kędzierzyn S.A. - internal service accessible exclusively to employees of Grupa Azoty Zakłady Azotowe Kędzierzyn S.A.; email (messages emailed to all employees through the [wszyscy_zak](#) distribution list); internal memos; orders; meetings with employees at various organisational levels (between the Management Board and managerial staff, or between managerial staff and employees - held as on-site sessions or via electronic tools; IT applications (some employees use Skype for Business and Microsoft Teams for day-to-day communication and participation in training).
- Employees and persons from outside the Company: the corporate *Grupa Azoty Magazine*, social media: Facebook, LinkedIn, X (formerly Tweeter), YouTube.
- Social dialogue forum: meetings of the Company Management Board and HR Manager with trade unions and social labour inspectors.
- Media: press releases, promotional and advertising publications; information published in the media tab of the Company website.
- Local community: local media (press articles and releases, radio programmes etc.), social media.

- Customers and suppliers: advertising brochures, Customer Service Office, regular contacts of sales managers and directors with customers, Agro and Oxoplast product websites.

The Company maintains a central register of key stakeholders, which is periodically updated.

How many complaints or grievances did the project receive from members of the public or civil society organisations during the reporting period? Please split by stakeholder group. Summarise any issues raised in the complaints or grievances and explain how they were resolved:

No such issues were reported.

9. Community Development

Please summarise any social or community development / investment initiatives undertaken by the Company during the reporting period, and any associated expenditure:

Partnership with Grupa Azoty ZAKSA Kędzierzyn-Koźle:

The first half of the year, ending the 2022/2023 season, was highly successful for Grupa Azoty ZAKSA Kędzierzyn-Koźle. The team made it to the finals of all four volleyball leagues (Polish Super Cup, Polish Cup, PlusLiga and Champions League). The club won its tenth Polish Cup and then, for the seventh consecutive time, played in the finals competing for the title of Poland's Champions. The highlight of its excellent performance over the season was the Superfinals of the Champions League. In Turin, the volleyball players from Kędzierzyn-Koźle triumphed in an impressive style, joining the elite group of teams that have won that tournament three times in a row.

Grupa Azoty ZAKSA Kędzierzyn-Koźle ended the 2022/2023 season playing in all possible volleyball competition finals, adding three more trophies to its record:

- Vice Champions of Poland 2023
- Polish Cup winner 2023
- Champions League winner 2023

In the second half of the year, despite winning the Polish Super Cup, the club started the 2023/2024 season significantly weakened by numerous injuries, as a consequence of which its performance deteriorated and it fell down the PlusLiga ranking table as at 31 December 2023.

As part of the Company's sponsorship and charitable efforts, relying on its Social and Sponsorship Policy, CSR Policy and Charitable Policy, Grupa Azoty ZAK S.A. additionally engaged in the following initiatives in 2023:

- Social responsibility and sponsorship programmes for culture
- Social responsibility and sponsorship programmes for professional and amateur sports
- Science and education programmes
- Environmental initiatives
- Grupa Azoty ZAK S.A. apiary project.

In 2023, the total amount allocated to social responsibility and sponsorship activities (excluding professional sports) was PLN 554,515.11.

Charitable Policy

The Charitable Policy of the Grupa Azoty Group sets forth the rules of making donations applicable to all Group companies. Through donations, the Group seeks to actively respond to the needs of foundations, associations, schools, non-profit organisations and individuals in difficult circumstances. In particular, the Group supports projects contributing to the enhancement of medical care, social and educational development of children and youth, as well as other initiatives benefiting local communities.

All donations were made in line with the Grupa Azoty Group's Charitable Policy effective in 2023, as well as the donation principles and rules adopted by Grupa Azoty ZAK S.A.

Pursuant to the Charitable Policy applicable at Grupa Azoty ZAK S.A. and the Donation Rules, the remaining donations by Grupa Azoty ZAK S.A. in 2023 were made for the following purposes:

- statutory goals,
- social assistance, including to families and individuals in difficult circumstances, and promoting equal opportunities for such families and individuals,

- charity,
- cultivating and fostering Polish traditions and national identity, strengthening of national, civic and cultural awareness,
- health protection and promotion,
- activities focusing on persons with disabilities,
- activities supporting the development of local groups and communities,
- science, higher education institutions, schooling, and education systems,
- activities for children and youth, including holidays for children and youth,
- culture, arts, and protection of cultural property and national heritage,
- supporting and promoting physical education,
- environmental protection, animal welfare and protection of natural heritage,
- public safety and order,
- rescue operations and civil protection,
- provision of assistance to victims of natural disasters, military conflicts and wars in Poland and abroad.

In 2023, the total value of Grupa Azoty ZAK S.A.'s donation projects reached PLN 611,657.

Awards, certificates and distinctions received in 2023:

1. In March 2023, following a recertification process conducted by PRS S.A., a certification body, Grupa Azoty ZAK S.A. received Integrated Management System Certificate No NC-3312 (valid through 13 February 2026) confirming conformity of the implemented and maintained system with the following standards: ISO 9001:2015 (quality), ISO 14001:2015 (environment), ISO 45001:2018 (OHS) and ISO 50001:2018 (energy management).
2. In July, Grupa Azoty ZAK obtained an extension of its Product Stewardship certification, following an audit carried out in January 2024 by DNV.
3. On 1 September, Grupa Azoty ZAK was awarded a *Wprost Eagle* in the Company of the Region category.
4. On 21 November, Grupa Azoty ZAK received its tenth Gold Card of Safe Work Leader. During the 26th Conference of the Safe Work Leaders Forum, the award was collected on behalf of the Company by Jakub Gładysz, Member of its Management Board, and Marcin Trochimowicz, Head of the OHS Department.
5. In 2023, Grupa Azoty ZAK secured the top position in the 'Pillars of the Opole Economy' ranking and 3rd place in the 'Top 100 Opole Businesses' category.
6. Grupa Azoty ZAK won the title of the 20th Anniversary Winner in the Opole Brand Competition. The venue of the jubilee award gala was the Exhibition and Convention Centre in Opole. On behalf of the Company, the statuette was collected by Lucjusz Adrian Stander, Member of its Management Board.
7. Grupa Azoty ZAK received 'Our Independent Opole Region' award presented by the Opole Provincial Office. The award was collected on behalf of the Company from Stawomir Kłosowski, Governor of the Opole Province, by Filip Grzegorzczak, President of the Grupa Azoty ZAK Management Board.

ENVIRONMENTAL AND SOCIAL ACTION PLAN

Table 0.1 Wisła Project, Grupa Azoty Poland - Environmental, Social, Health and Safety (ESHS) matters, Updated (Alchemist Project)
Action Plan:

GRUPA AZOTY ZAKŁADY AZOTOWE KĘDZIERZYN S.A.

4. Actions required to maintain compliance with EHS requirements of national law and EU environmental standards - Zakłady Azotowe Kędzierzyn							
No.	Action	Environmental risks, liabilities/benefits	Legislative requirements/Best practice	Requirement/Resources	Scheduled completion – action to be completed by end of year	Target and evaluation criteria for implementation progress	Comments
4.1	<p>Complete the planned construction of energy generation installations to ensure compliance with IED post 2016, taking into account the derogations agreed upon with competent authorities.</p> <p>Target emission levels: 200 mg/m³ for SO₂ 200 mg/m³ for NO_x 20 mg/m³ for PM.</p>	<p>Reduce negative environmental impact in line with IED requirements.</p> <p>The Company is planning to install new coal-fired boilers to replace old units. All new units must comply with IED.</p>	Legislative requirements, best management practices, Bank's PRs	Investment needs	<p>2015/2016 – milestone 1 2017-2021 – milestone 2 2019-2024 – new concept</p>	<p>Obtain a relevant permit for the new facility</p> <p>Update information on the project in the annual report, selected technology and target emission levels.</p> <p>Publish NTS of the project and provide copy/web link to the Bank as part of the annual report.</p>	<p>Milestone 1 – completed</p> <p>Milestone 2 – abandoned and replaced with a new concept (with a new completion date)</p>

Information:

Two milestones have been scheduled for the project on a preliminary basis, including:

- 2014-2016: execution of milestone 1, i.e. construction of a coal-fired boiler house with a capacity of 140 Mg/h, installation of a 25 MWe pass-out and condensing turbine, and construction of a control centre building. This milestone was completed in 2017.
- Originally, the following was planned for 2017-2021: execution of milestone 2 of the CHP project, as per the 2013 Feasibility Study, involving the construction of a second coal-fired boiler with a capacity of 140 Mg/h and a gas and oil-fired boiler house with a capacity of 2 x 70 Mg/h. The milestone was ultimately abandoned on the Steering Committee's recommendation to modify the 'New CHP Plant at Grupa Azoty ZAK S.A. - milestone 2' project under the Management Board's Resolution No. 294/18 of 11 October 2018.

In the first quarter of 2019, accompanying reports were drawn up for the 'Innovative management of heat from ammonia production processes as an alternative to heat generation in coal-fired boilers' concept. By official instruction No. 6/19 of 6 March 2019, a team was established to introduce and implement the New Concept. In April 2019, the team decided to select the gas-fired peak-load/reserve boiler house system configuration based on two new boilers with a capacity of 100t/h and 50t/h, respectively, for further preparatory work.

The reserve boiler house functioning as a peak-load source will operate in conjunction with the OP140 steam generator at the existing ZAK CHP plant. In the event of downtime of the coal-fired boiler at the existing ZAK CHP plant, the peak-load/reserve boiler house will operate as a stand-alone reserve steam generator. The existing five Pauker boilers are to be decommissioned following completion of the peak-load/reserve boiler house.

On 17 June 2019, the Group's Development Committee approved the new project for innovative management of heat from ammonia production processes as an alternative to heat generation in coal-fired boilers.

On 24 October 2019, the Contract Award Committee was established in connection with the procurement procedure for the construction of a peak-load/reserve boiler house in accordance with the recommended concept.

In accordance with a report approved on 18 August 2020, the Tender Committee selected the General Contractor for the project. On 5 November 2020, a contract was signed for the construction of a peak-load and reserve boiler house with the POLIMEX ENERGETYKA-POLIMEX Mostostal consortium. Work commenced in accordance with the agreed schedule.

On 20 January 2021, the Project Information Sheet was submitted. An Environmental Permit was secured on 11 May 2021, followed by a Building Permit on 14 October 2021 and a Replacement Decision on 16 December 2021.

On 4 May 2022, project documentation prepared by a service provider was received.

In May 2022, the scheduled work on the facility site was commenced.

2023 saw the installation of equipment, systems and connections on the facility site, but in December the contract was amended with respect to the completion deadlines due to temporary suspension, as of 30 May 2023, of its performance by the Contractor, i.e. the Consortium of: Polimex Energetyka Sp. z o.o. (the Consortium Leader) and Polimex Mostostal S.A. (the Consortium Partner). The parties agreed to amend the project schedule, including completion of the necessary assembly works, commissioning and acceptance testing. According to the revised schedule, an adjustment run will take place in the first half of May 2024, followed by a test run, warranty measurements and acceptance.

4.2	Complete restoration of the old waste landfill site and continue monitoring of waste landfilling conditions.	Reduce negative environmental impact	Legal requirements/best management practice	Internal resources and external support	Ongoing		
<p>Information: All landfill sites within Grupa Azoty ZAK S.A. premises, including inactive and restored sites, are monitored to ensure compliance with permits held.</p>							

4.3	Prepare a plan and potential budget for removal of redundant/not operational installations/buildings and structures	Reduce negative environmental impact	Best management practice	Internal resources and external support	Action plan and potential budget to be decided in 2013 and updated in 2018	Prepare a plan and potential budget for removal of redundant/not operational installations/buildings and structures	
<p>Information: Grupa Azoty Zakłady Azotowe Kędzierzyn S.A. is engaged in ongoing demolition and disassembly of buildings, structures, pipelines and equipment, along with the accompanying fixtures and fittings, racks and supports, which have been retired from service and are redundant for the Company's purposes. In 2023, expenditure on this work amounted to PLN 419,232.91 (exclusive of VAT).</p>							

1. Information about the Company
Company Name: Grupa Azoty Zakłady Fosforowe Gdańsk Sp. z o.o.
Company Address: ul. Kujawska 2, 80-550 Gdańsk
Country: Poland
Town/Location: Gdańsk
Company authorised representative: Waldemar Kolanowski I certify that the data contained in this report completely and accurately represents the Company's operations during the reporting period. Signature:
Chief Process Engineer Date: 30 April 2024 Contact Details: Telephone: (+48) 58 34 33 398 Email: w.kolanowski@fosfory.pl

Please provide key data on the Company performance, as well as production levels at each plant. For each of the 7 large plants please provide:

Item (PLN '000)	Cumulative	
	2022	2023
Revenue	346,546	257,988
Profit/(loss) on sales	81,610	45,257
EBIT	48,696	11,375
EBITDA	64,391	29,687
Net profit/(loss)	37,044	5,880

Data from the Company's separate financial statements

Key performance indicators in terms of energy consumption, emissions, use of natural resources, and carbon dioxide emissions;

Number of staff employed and any change in employment over past 3 years

	As at 31 Dec 2021	As at 31 Dec 2022	As at 31 Dec 2023
Number of direct employees:	262	250	261
Number of contracted workers:	0	0	0

Provide information on permits and each subsidiary's compliance status with IPPC/IED (*Integrated Pollution Prevention and Control Directive/Industrial Emissions Directive*)

Reporting period: 2023

2. General information

Is the project materially compliant with all relevant EBRD Performance Requirements (taking account of agreed action plans, exemptions or derogations)?	Yes [X] Yes [X]	If NO, please provide details of any material non-compliances:
Is the project materially compliant with all applicable environmental and social laws and regulations?	Yes [X] Yes [X]	If NO, please provide details of any material non-compliances:
Have there been any accidents or incidents that have caused damage to the environment, brought about injuries or fatalities, affected project labour or local communities, affected cultural property, or created liabilities for the company?	No [X] No [X]	If YES, please describe, including details of actions to remedy and prevent reoccurrence:
Have there been any changes to environment, social, labour or health and safety laws or regulations that have materially affected the Company?	Yes [X] Yes [X]	If YES, please describe: Amendments to regulations applicable to remote work.
How many inspections did you receive from the environmental authorities during the reporting period?	Number: 2 Number: 2	Please provide details of such inspections, including the number and nature of any violations found: In August and September 2023, the Provincial Inspectorate for Environmental Protection (WIOŚ) of Gdańsk inspected the plant's compliance with the environmental regulations applicable to gas and particulate matter emissions into the air, compliance with the provisions of the integrated (IPPC) permit, implementation of requirement notices issued as a result of earlier inspections and performance of tasks specified in the air quality programme after an exceedance of air quality standards for sulfur dioxide had been identified in the Tricity agglomeration zone. The inspection found no violations of environmental protection regulations with respect to emissions of gases and particulate matter into the air or provisions of the integrated (IPPC) permit. In May and June 2023, the Provincial Inspectorate for Environmental Protection (WIOŚ) of Gdańsk inspected the closed phosphogypsum landfill site in Wiślinka. The inspection identified no breaches of the applicable environmental regulations and administrative decisions relating to the closed phosphogypsum landfill site in Wiślinka.

How many inspections did you receive from the health and safety authorities during the reporting period?	Number: 1 Number: 2	Please provide details of such inspections, including the number and nature of any violations found: Inspection by the State Border Sanitary Inspector of Gdynia - recommendations: put names of trained personnel on the first aid kits, repaint the bathroom wall coating, repair a damaged stair step. Inspection by the National Labour Inspectorate - recommendations: ensure adherence to the Company's internal regulations.
How many inspections did you receive from the labour authorities during the reporting period?	Number: 0 Number: 1	Please provide details of such inspections, including the number and nature of any violations found: Inspection by the National Labour Inspectorate - recommendations: ensure adherence to the Company's internal regulations.
Have these visits resulted in any penalties, fines and/or corrective action plans?	No <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/>	If YES, please describe, including status of implementing corrective actions to address any violations found:
Has the Company engaged any contractors for project-related work in the reporting period?	No <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/>	If YES, please state for which types of work, and how the Company has monitored the compliance of contractors with EBRD Performance Requirements and the Environmental and Social Action Plan:
Were any of the violations stated above the responsibility of contractors?	No <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/>	If YES, please provide details, including how the Company is ensuring that corrective actions are implemented by the contractor?
Have any operations been reduced, temporarily suspended or closed down due to environmental, health, safety or labour reasons?	Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/>	If YES, please describe:
Please describe any environment or social programmes, initiatives or sub-projects undertaken during the reporting period to improve the Company's environmental or social performance and/or management systems: As part of its corporate social responsibility activities (CSR), in 2023 Grupa Azoty Fosfory Sp. z o.o.: - was a sponsor of the NordCup Gdańsk Regatta - contract with the University Sports Centre of Gdańsk - Górkki Zachodnie, - donated equipment to the State Fire Service - in-kind donation agreement with the City Headquarters of the State Fire Service in Gdańsk, - supported the Vistula River Museum in Kazimierz Dolny - in-kind donation agreement.		
Please indicate the level of associated expenditure (capital expenditure and operating expenditure), and whether this relates to the requirements of the Environmental and Social Action Plan, or to any other initiative: The expenditure relates to CSR Regatta - PLN 20,000, exclusive of VAT State Fire Service - PLN 6,125.01, inclusive of VAT Vistula River Museum - PLN 16,748.70, inclusive of VAT		

3. Status of the Environmental and Social Action Plan

Please provide information on the status of each item in the Environmental and Social Action Plan

(ESAP) agreed with EBRD. If the ESAP was updated during the reporting period, please attach a copy of the new plan.
[Not applicable.](#)

4. Environmental Monitoring Data for each of the key subsidiaries

The information required in this section can be extracted from a CSR report, or a full CSR report can be attached.

[For detailed information, see Section 8.](#)

Please provide the name and contact details for your environmental manager:	Environmental Protection and Chemical Safety Officer Lidia Wilczewska-Treder Telephone: (+48) 58 343 383 12 Mobile: (+48) 669 600 394 l.wilczewska@fosfory.pl
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Parameter ²	Amount ³	Unit	Compliance Status ⁴ Permissible level specified in Integrated (IPPC) Permit DROŚ-SO.7222.45.2013/2014.BA of 1 August 2014, as amended by Decision DROŚ-SO.7222.60.2014.EŻ of 4 December 2014 and Decision DROŚ-SO.7222.81.2017.EŻ of 24 August 2018 issued by the Marshal of the Gdańsk Province	Comments ⁵
Wastewater				
Total wastewater	9,392,331 7,011,567	m ³ /year	26,532,000 m ³ /year No exceedance of the permissible limits was found.	Wastewater is comprised of cooling water.
Biochemical Oxygen Demand (BOD5)	----	mg/l	-	None
Chemical Oxygen Demand (COD)	----	mg/l	-	
Suspended solids	average 20.6 maximum 27.0 average 25.7 maximum 30.0	mg/l	35 mg/l No exceedance of the permissible single measurement or average annual limits was found.	None
Phosphorus	-	-	GA FOSFORY Sp. z o.o. does not monitor phosphate levels in industrial wastewater.	None
Nitrates	-	-	GA FOSFORY Sp. z o.o. does not monitor nitrate levels in industrial wastewater.	None

Heavy metals	-	-	GA FOSFORNY Sp. z o.o. does not monitor heavy metal levels in industrial wastewater.	None
Petroleum hydrocarbons	average 0.46 maximum 2.65 average 0.14 maximum 0.41	mg/l	15 mg/l No exceedance of the permissible single or average annual limits was found.	None
pH	minimum 6.8 maximum 8.3 minimum 7.1 maximum 7.9	-	.	None
Temperature	maximum 33.1 maximum 32.7	°C	35°C No exceedance of the permissible single measurement limits was found.	None

Air emissions				
Type of substance	Major point source	Mg/year		
SO ₂	Manufacture of fertilizers	11.58 44.20	157.40 Mg/year No exceedance of the permissible limits was found.	None
	Manufacture of sulfuric acid	13.92 9.22	156.50 Mg/year No exceedance of the permissible limits was found.	None
	Boiler house	0.45 0.27	No permissible limits have been defined.	None
Nitrogen oxides (NO _x)	Manufacture of fertilizers	14.09 19.46	88.98 Mg/year No exceedance of the permissible limits was found.	None
	Manufacture of sulfuric acid	2.55 2.85	3.40 Mg/year No exceedance of the permissible limits was found.	None
	Boiler house	1.18 0.70	No permissible limits have been defined.	None
Particulates	Manufacture of fertilizers	11.80 12.68	35.13 Mg/year 35.50 Mg/year No exceedance of the permissible limits was found.	None
	Fertilizer compaction	0.10 0.09	No permissible limits have been defined.	None
	Boiler house	0.65 0.39	No permissible limits have been defined.	None
	Bulk goods handling at the terminal	4.71	6.953 Mg/year No exceedance of the permissible limits was found.	
CO ₂	Boiler house	426.54 253.77	No permissible limits have been defined.	None
Fluorine	Manufacture of fertilizers	0.64 0.83	6.16 Mg/year No exceedance of the permissible limits was found.	None

CO	Manufacture of fertilizers	2.62 4.96	8.94 Mg/year No exceedance of the permissible limits was found.	None
	Boiler house	0.12 0.07	No permissible limits have been defined.	None
Sulfuric acid	Manufacture of sulfuric acid	1.56 1.38	12.18 Mg/year No exceedance of the permissible limits was found.	None

Other parameters					
Noise emissions	Daytime	Process downtime	49.7-54.4 49.7-54.4	Permissible noise levels for residential areas. Noise emissions from the GA Fosfory facilities have no impact on the neighbouring residential areas.	Relevant tests are performed every two years.
		Production run	54.2-61.8 54.2-61.8		
	Night time	Process downtime	46.9-47.9 46.9-47.9		
		Production run	52.0-61.2 52.0-61.2		

Solid waste				
Waste type	Waste code	Quantity of generated waste [Mg]		Comments
Wastes not otherwise specified (here: waste sulfur)	06 01 99	109.24 10.00	No exceedance of the permissible limits was found.	None
Waste plastic	07 02 13	0.430 3.980		None
Rubber waste from production unit overhaul	07 02 80	16.740 17.820		None
Mineral-based non-chlorinated engine, gear and lubricating oils	13 02 05*	0.0355 0.100		None
Oily water from oil/water separators	13 05 07*	1.580 0.760		None

Paper and cardboard packaging	15 01 01	27.640 11.700		None
Plastic packaging	15 01 02	44.220 95.457		None
Wooden packaging	15 01 03	27.820 16.440		None
Packaging containing residues of hazardous substances	15 01 10*	1.337 2.556		None
Absorbents, filter materials, wiping cloths (filter cloths)	15 02 03	0.610 1.668	No exceedance of the permissible limits was found.	None
End-of-life tyres	16 01 03	0.110 0.000		None
Discarded equipment containing hazardous components other than those mentioned in 16 02 09 to 16 02 12	16 02 13*	0.220		None
Discarded equipment other than that mentioned in 16 02 09 to 16 02 13 (computers, copy machines, fax machines and other discarded electrical devices)	16 02 14	0.393 2.880		None
Components removed from discarded equipment other than those mentioned in 16 02 15	16 02 16	0.740		None
Laboratory chemicals (e.g. chemical reagents) consisting of or containing dangerous substances, including mixtures of laboratory chemicals	16 05 06*	0.187		None
Waste chemicals other than those mentioned in 16 05 06, 16 05 07 and 16 05 08	16 05 09	0.084		None
Aluminium	17 04 02	1.700 0.760		None

Steel from discarded equipment	17 04 05	142.300 492,1734		None
Soil and stones containing hazardous substances	17 05 03*	5.080 0.000		None
Soil and stones other than those mentioned in 17 05 03	17 05 04	424.60 0.000		None
Insulation materials other than those mentioned in 17 06 01 and 17 06 03	17 06 04	1.100 2.460		None
Please provide details of the types and amounts of solid wastes generated by the project. Indicate where wastes are classified as hazardous. Indicate the final re-use, recycle or disposal method for each waste type.				

5. Resource Usage and Product Output			
Parameter	Amount	Measurement Unit	Comments ⁶
Fuels used:			
- fuel oil RG3	3,685 3,055	Mg	
- light fuel oil	236,971 140,984	L	
Crude oil	Not applicable		
Natural gas	8,268 MWh		
Hard coal	Not applicable		
Lignite	Not applicable		
Grid electricity (from external provider)	14,775 16,354	MWh	
Heat purchased from external sources	Not applicable		
Feedstocks and raw materials consumed:			
phosphate rock from Morocco 68-69	8,211 9,482	Mg	
phosphate rock from Algeria	4,332 655	Mg	
phosphate rock from Senegal	0 0	Mg	
phosphate rock from Egypt	23,347 21,188	Mg	
ammonium sulfate	615 1,049	Mg	
ammonium sulfate FGD	10,690 9,700	Mg	

zinc sulfate	21 38	Mg	
anhydrous sodium sulfate	0 0	Mg	
granulated potassium chloride	1,649 2,459	Mg	
fine potassium chloride	26,030 22,080	Mg	
phosphoric acid from external sources 100% P2O5	7,199 5,637	Mg	
sulfuric acid from external sources	1,800 1,176	Mg	
borax	140 105	Mg	
crystalline magnesite R 30	493 222	Mg	
crystalline magnesite R 40	0 0	Mg	
liquid sulfur	30,772 24,973	Mg	
soda lye	808 724	Mg	
ascorbic acid	2 3	Mg	
Product output:			
SULFURIC ACID	90,966 73,830	Mg	
SODIUM BISULFITE	1,557 1,415	Mg	
ENHANCED SUPERPHOSPHATE 'SUPER-FOS-DAR 40'	27,350 18,500	Mg	
ENHANCED SUPERPHOSPHATE 30	7,557 10,045	Mg	
AMOFOSKA 4-16-18	12,494 12,710	Mg	
AMOFOSKA 5-10-25+B	19,364 12,506	Mg	
AMOFOSKA/NPK 4-12-12	5,454 6,440	Mg	
NPK 5-12-12	4,270	Mg	
AMOFOSKA Corn 4-10-22	2,384 4,360	Mg	
AMOFOSKA 4-10-28 + 2Mg	0 0	Mg	
AMOFOSKA 4-12-20	0 0	Mg	
Granulated potassium chloride	3,440 2,020	Mg	
AMOFOSKA 5-12-28	0 0	Mg	
AMOFOSKA 3.5-10-24	2,070 1,700	Mg	
AMOFOSKA 5-10-22	0 0	Mg	

FOSFARM 4-10-15	5,475 8,296	Mg	
HOLIST PK 15-30	10,682 8,676	Mg	
HOLIST PK 16-28	3,814 5,237	Mg	
HOLIST PK 12-36	0 0	Mg	
HOLIST NK 10-31	0 0	Mg	
HOLIST PK 20-20	45 250	Mg	
HOLIST KMg 55-5	2,570 2,328	Mg	
HOLIST NK 14-20	833 0	Mg	
HOLIST PK 14-32	544 0	Mg	
HOLIST PK 10-40	1,076 0	Mg	

6. Human Resources management			
Please provide the name and contact details for your Human Resources manager:		Violetta Wuczyńska Head of the HR and Organisational Department telephone: (+48) 58 34 38 250 mobile: (+48) 669 600 426 Email: v.wuczynska@fosfory.pl	
	Total	Recruited in this reporting period	Terminated in this reporting period
Number of direct employees:	250/ 261	35 / 57	47 / 49
Number of contracted workers:	0 / 0	0 / 0	0 / 0
Were there any collective redundancies during the reporting period?	No [X] No [X]	If YES, please describe the redundancy plan, including reasons for redundancies, number of workers involved, how they were selected, consultation undertaken, and measures to mitigate the effects of redundancy:	
Are any redundancies to the workforce planned for the next year?	No [X] No [X]	If YES, please describe the redundancy plan, including reasons for redundancies, number of workers involved, and selection and consultation process:	
Were there any changes in trade union representation at Company plants during the reporting period?	No [X] Yes [X]	If YES, please provide details, and summarise engagement with trade unions during the reporting period: In 2022 Change in the position of Chairman of the Independent and Self-Governing Trade Union Solidarność Change in the position of Chairman of the Trade Union of Chemical Industry Workers.	
Were there any other worker representatives (e.g. in the absence of a trade union)?	Yes [X] Yes [X]	If YES, please provide details and summarise engagement with them during the reporting period: 2023 - the term of office of the Works Council expired and employees were advised of their right to elect members of the next Works Council.	

Were there any changes in the status of Collective Agreements?	No <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/>	If YES, please provide details:
Have employees raised any grievances with the project during the reporting period?	No <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/>	If YES, please state how many, split by gender, summarise the issues raised in grievances by male and female staff and explain how the Company has addressed them:
Have employees raised any complaints about harassment or bullying during the reporting period?	No <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/>	If YES, please state how many, split by gender, summarise the issues raised by male and female staff and explain how the Company has addressed them: There was one complaint about 'inappropriate behaviour' and unsolicited remarks directed to a female employee at a task team's meeting. The investigation was closed due to termination by mutual agreement of the employment relationship with the staff member concerned. The employee on behalf of whom the complaint had been raised was informed of the findings of the ethics team.
Have there been any strikes or other collective disputes related to labour and working conditions at the Company in the reporting period?	No <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/>	If YES, please summarise nature of, and reasons for, the disputes and explain how they were resolved:
Have there been any court cases related to labour issues during the reporting period?	Yes <input checked="" type="checkbox"/> Yes <input checked="" type="checkbox"/>	
Have there been any changes to the following policies or terms and conditions during the reporting period in any of the following areas: <ul style="list-style-type: none"> – Trade union recognition – Collective Agreements – Non-discrimination and equal opportunities for all – Equal pay for equal work – Gender equality – Bullying and harassment, including sexual harassment – Employment of young workers under 18 – Wages and salaries (for regular and overtime hours) – Overtime – Working hours – Flexible working / work-life balance – Grievance mechanism for workers – Health & safety 	Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/>	If YES, please give details, including of any new initiatives: In 2022: <ul style="list-style-type: none"> • Organisational Rules - the introduced changes were aimed at adapting the organisational structure to the Company's current needs taking into account the division of powers and duties between the Management Board Members and the subordination of organisational units, and also clarified and updated the tasks carried out by the individual organisational units.

7. Occupational Health and Safety Data					
Please provide the name and contact details for your Health and Safety manager:		Piotr Perka OHS Officer Telephone: (+48) 669 600 416 Email: p.perka@fosfory.pl			
	Direct employees	Contracted workers		Direct employees	Contracted workers
Number of man-hours worked in this reporting period:	423,905 424,052		Number of fatalities ⁷ :	0 0	0 0
Budget spent on OHS in this period (total amount and currency):	approx. PLN 300,000 PLN 146,000		Number of disabling injuries:	0 0	0 0
OHS training provided in this period in person-days:	163 174		Number of Lost Time Incidents (including vehicular):	8 10	0 0
Number of lost workdays resulting from incidents:	475 195		Number of cases of occupational disease:	0 0	0 0
Sick time (hours):	41,805 34,928				
<p>Accident causes (falling from height, carrying heavy loads, struck by a falling object, contact with a flame or a hot/burning object/environment, etc.):</p> <ul style="list-style-type: none"> - falling from height - impact and pinching - impact against a stationary object - chemical burn - chemical burn - falling on the same level or lower - having a finger pressed 					
<p>Please provide details of any fatalities or major accidents that have not previously been reported to EBRD, including total compensation paid due to occupational injury or illness (amount and currency):</p> <p>In 2022, there were no fatal or major accidents. In 2023, there were no fatal or major accidents.</p>					
<p>Please summarise any emergency prevention and response training that has been provided for Company personnel during the reporting period:</p> <p>The GA FOSFORO OHS function is not responsible for emergency management.</p> <p>In 2021, the GA FOSFORO OHS function was not involved in emergency management.</p>					

Please summarise any emergency response exercises or drills that have been carried out during the reporting period:

The GA FOSFORO OHS function is not responsible for emergency management.

In 2023, office building evacuations were carried out in accordance with the scope of firefighting activities covered by applicable regulations.

8. Stakeholder Engagement

- Helena Mielewczyk - Marketing Specialist
- Aleksandra Poulakowska-Derda - Marketing Specialist
- Lidia Wilczewska-Treder - Environmental Protection and Chemical Safety Team
- Piotr Perka - OHS Officer

GA FOSFORO Sp. z o.o. does not employ an external relations or community engagement manager. Tasks of the external relations or community engagement manager are performed by relevant units

- Environmental Protection and Chemical Safety Officers
- Marketing Specialists
- OHS Officer

Please provide information on the implementation of the Stakeholder Engagement Plan agreed with EBRD and summarise interaction with stakeholders during the reporting period, including:

- meetings or other initiatives to engage with members of the public or public organisations during the reporting period
- information on environmental protection, social policy and safety matters provided to the local community and other stakeholders during the reporting period:
- coverage in the media:
- interaction with any environmental or other community groups.

In 2022, Grupa Azoty Fosfory sp. z o.o. carried out a range of CSR activities planned in the previous year.

1. Sport is one of the domains to which Grupa Azoty Fosfory is committed. As a sponsor of the NordCup Gdańsk Regatta, the Company provided financial and organisational support. The regatta in Gdańsk was attended by 1,012 competitors, 32 referees and 48 members of the organiser team.
2. Grupa Azoty Fosfory also purchased equipment for the State Fire Service - under an in-kind donation agreement with the City Headquarters of the State Fire Service in Gdańsk, training equipment was donated to help firefighters develop and maintain adequate physical fitness, a critical factor for effective emergency and firefighting operations.
3. The Company supported the Vistula River Museum in Kazimierz Dolny - under an in-kind donation agreement, it provided 4 tonnes of Holist fertilizer and ensured its transport to help maintain the historical part of the vineyard and vine plantings cultivated by the Museum.

Please describe any changes to the Stakeholder Engagement Plan (SEP) agreed with EBRD:

Not applicable

How many complaints or grievances did the project receive from members of the public or civil society organisations during the reporting period? Please split by stakeholder group. Summarise any issues raised in the complaints or grievances and explain how they were resolved:

No complaints were received.

9. Community Development

Please summarise any social or community development / investment initiatives undertaken by the Company during the reporting period, and any associated expenditure:

In 2023, GA FOSFORRY continued to recover phosphates from sewage sludge incineration ash classified as waste designated with code 19 01 14 as well as wastes designated with code 19 01 12.

The initiative has reduced the volumes of waste transferred to the landfill site from the neighbouring sewage treatment plants and animal waste disposal plant.

ENVIRONMENTAL AND SOCIAL ACTION PLAN

<i>7. Actions required to maintain compliance with EHS requirements of national law and EU environmental standards - GA Fosfory</i>							
No.	Action	Environmental risks, liabilities/benefits	Legislative requirements/ Best practice	Requirement/ Resources	Scheduled completion - action to be completed by end of year	Target and evaluation criteria for implementation progress	Comments
7.1	<p>Complete environmental risk assessment for groundwater from historical landfill site.</p> <p>Based on risk assessment and surveys, develop a plan for long-term monitoring and actions to reduce the risk of contaminating groundwater and water reservoirs.</p> <p>Budget for the actions needs to be developed.</p>	<p>Reduce negative environmental impact in line with IED and the Bank's PRs.</p> <p>The landfill site is situated in a vulnerable location, which could result in contamination of deeper water reservoirs used by the Town.</p> <p>A comprehensive risk assessment must be performed, and the investment projects must reduce impacts. General site restoration is needed and a landfill site management system must be put in place.</p>	<p>Legislative requirements, best management practices, the Bank's PRs, EU Environmental Liability Directive (ELD)</p>	<p>Internal resources and external support</p>	<p>End of 2013 - prepare the action plan and preliminary budget.</p> <p>Contingent liabilities/provisions in annual financial statements by 2013.</p> <p>Risk assessment by 2017.</p>	<p>Risk assessment and action plan.</p> <p>Summary of both in the annual report.</p>	

Notes to 7.1	<p>1. The phosphogypsum landfill site in Wiślinka has been closed since 31 December 2009. It was closed pursuant to the Marshal of the Gdańsk Province's decision, and the process was carried out in accordance with closure plans providing for mechanised land restoration and in accordance with a bioremediation plan. The closure was supervised by authorised technical experts and employees of the environmental protection department of the Marshal Office of the Gdańsk Province. The closed landfill site is supervised by environmental protection authorities and monitored on a continuous basis in accordance with applicable laws.</p> <p>2. IED requirements do not apply to the phosphogypsum landfill site in Wiślinka, which was closed pursuant to the Marshal of the Gdańsk Province's decision. It has a closed site status, no new waste is received, and the site is subject to monitoring.</p> <p>3. In April 2014, an environmental review of the closed phosphogypsum landfill site in Wiślinka was submitted to the Marshal Office and the Provincial Inspectorate for Environmental Protection (WIOŚ) of Gdańsk. According to the review, the impact of the landfill site on the environment is not significant.</p> <p>4. Since August 2014, pursuant to Decision of 1 August 2014 Ref. No. DROŚ-SO.722.45.2013/2014.BA granting an integrated (IPPC) permit to the Company, leachate from the retention reservoir has been transferred to GA FOSFORY for recovery. By the end of 2023, around 76.2 thousand Mg of leachate had undergone recovery, and thus approximately 884 Mg of phosphorus in P₂O₅ equivalent had been removed from the landfill site. Under the permit, 24,000 m³ of leachate may be transferred annually. The transfer and recovery of phosphate-containing leachate will accelerate the process of restoring the site to its original condition.</p> <p>5. In 2023, the Hydroengineering Institute of the Polish Academy of Sciences of Gdańsk was engaged in research and development work at the phosphogypsum landfill site to prepare an assessment of the heap stability. The research is subsidised by the Provincial Fund for Environmental Protection and Water Management in Gdańsk.</p> <p>The Company has set up a provision for remediation and securing of the closed phosphogypsum landfill site in Wiślinka. As at 31 December 2022, the provision was PLN 3,441,444.</p> <p>The maintenance, remediation and monitoring of the landfill site are financed solely with the Company's own funds.</p>
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7.2	Set up a procedure to process complaints and grievances to enable meaningful public consultation and information process with regard to historical and current EHS impact of the Wiślinka landfill site in Gdańsk.	Identification of problems and public complaints in order to implement solutions designed to improve public perception of the Wiślinka landfill site	Best practice and compliance with EBRD and PR10 requirements.	Operational costs of information office.		Management reports on application of the grievance procedure Summary of systems in the annual report for the Bank	
Notes to 7.2	<p>The Company has a procedure in place for managing grievances and complaints in accordance with the ISO 9001 standard under the management system used by the Company. Grievances, complaints or other comments can be submitted using a contact form available from the Company's website. Any important events are communicated by the Company on its website. Over the past few years, the Company has received no grievances or complaints with respect to its production facilities in Gdańsk or the closed phosphogypsum landfill site in Wiślinka.</p> <p>A series of articles on removal and recovery of phosphates-containing leachate and the role of the process in accelerating landfill site remediation were also published to change public opinion on the Wiślinka landfill. One such article was 'Innovative technology to enable Grupa Azoty to make fertilizers from waste', posted at https://chemia.wnp.pl/innowacyjna-technologie-pozwoli-grupie-azoty-produkowac-nawozy-z-odpadow,236125_1_0_0.html.</p> <p>In 2022, the Air Quality Programme for the Tricity agglomeration zone, in which the permissible level of sulfur dioxide was exceeded, was sent to GA FOSFOROY for opinion. The Programme was developed by the Marshal Office of the Gdańsk Province.</p> <p>In 2023, GA FOSFOROY participated in the Air Quality Programme for the Tricity agglomeration zone. Participation in the programme consists in performing various tests to detect leaks causing fugitive emissions (outside of installations) and leaks inside apparatus and equipment disrupting the sulfuric acid production. GA FOSFOROY prepared a 'Report on measures taken in 2023 to improve air quality in terms of sulfur dioxide emitted from installations owned by Grupa Azoty Zakłady Fosforowe Gdańsk Sp. z o.o. in Gdańsk' and submitted to the Marshal Office of the Gdańsk Province.</p>						
7.3	Prepare a plan (including budget) and conduct soil and surface water assessment within the plot.	Reduce negative environmental impact in line with IED	Legislative requirements, best management practices, Bank's PRs	Internal resources and external support	2016 /2017	Report on soil and groundwater condition	

Notes to 7.3	<ol style="list-style-type: none"> 1. The Company has set up a provision for remediation and securing of the closed phosphogypsum landfill site in Wiślinka. As at 31 December 2022, the provision was PLN 3,441,444. The maintenance, remediation and monitoring of the landfill site are financed solely with the Company's own funds. 2. Surface water quality assessment The Company carries out surface water quality testing in accordance with the Monitoring Plan for the closed phosphogypsum landfill site in Wiślinka, as approved by the Marshal of the Gdańsk Province. Such tests are also carried out by the Provincial Inspector for Environmental Protection. 3. Soil and vegetation evaluation in the phosphogypsum landfill site's surrounding area Soil and vegetation quality testing was carried out within the protection zone of the phosphogypsum landfill site in Wiślinka and on agricultural land beyond that zone. The evaluation was carried out by independent specialist bodies: <ul style="list-style-type: none"> – Agricultural Academy of Wrocław and Wrocław University of Science and Technology, – National Agrochemical Station in Gdańsk. According to the evaluation, the landfill site poses no threats to the natural and agricultural environment of Wiślinka. 4. In 2014, the Company began removing leachate from the retention reservoir of the closed phosphogypsum landfill site in Wiślinka. As a result, the impact of the landfill site on the natural environment has been reduced, and the remediation process has been accelerated. 5. Assessment of the geological and geotechnical condition of the heap in Wiślinka. In 2023, the Hydroengineering Institute of the Polish Academy of Sciences of Gdańsk was engaged in research and development work at the phosphogypsum landfill site to prepare an assessment of the heap stability. 6. Soil condition assessment and groundwater surveys on GA FOSFORŹ's land plots on which the principal activities covered by the Integrated Permit are carried out. In July 2017, the Environmental Research Laboratory of Przedsiębiorstwo Geologiczne Sp. z o.o. of Kielce, holding accreditation No. AB 1010 from the Polish Centre for Accreditation, carried out relevant tests of soil and groundwater samples. Based on the tests, a baseline report was drawn up, proposing that soil and ground contamination risk be assessed once every ten years, and that groundwater quality be tested once every five years. The Marshal Office approved the frequency of testing proposed in the baseline report through the provisions contained in Decision No. DROŚ-SO.7222.81.2017.EŻ of 24 August 2018.
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1. Information about the Company	
Company Name: Grupa Azoty Zakłady Azotowe Chorzów S.A.	
Company Address: ul. Narutowicza 15	
Country: Poland	
Town/Location: 41-503 Chorzów	
Company authorised representative: 1)	
I certify that the data contained in this report completely and accurately represents the Company's operations during the reporting period.	
Signature:	
Title: Technical Director	Date: 30 April 2024
Krzysztof Lisowicz	
Contact Details:	
Telephone:	
mobile (+48) 530 920 060	
Email: krzysztof.lisowiczi@grupazoty.com	

Please provide key data on the Company performance, as well as production levels at each plant. For each of the 7 large plants please provide:

Item	Cumulative			
	[PLN '000]	2021	2022	2023
Revenue		66,170	99,977	74,985
Gross profit/(loss)		9,905	21,939	11,804
EBIT		92	11,486	1,968
EBITDA		3,035	14,758	5,161
Net profit/(loss)		-921	7,500	(2,537)

Key performance indicators in terms of energy consumption, emissions, use of natural resources, and carbon dioxide emissions:

Number of staff employed and any change in employment over past 3 years

	As at 31 Dec 2021	As at 31 Dec 2022	As at 31 Dec 2023
Number of direct employees:	124	115	107
Number of contracted workers:	-	-	-

Provide information on permits and each subsidiary's compliance status with IPPC/IED (*Integrated Pollution Prevention and Control Directive/Industrial Emissions Directive*)

No new decisions for IPPC installations operated by the Company were issued in 2023.

1. Integrated (IPPC) permits held by GA ZACH S.A.:

Integrated permit for the potassium nitrate and calcium nitrate production installation:

Following numerous amendments to the integrated (IPPC) permit, GA ZACH S.A. applied to the Marshal of the Katowice Province to issue an amended and consolidated version of the permit. The consolidated text of the integrated permit was issued by Decision Ref. No. 3035/OE/2023 of the Marshal of the Katowice Province dated 31 August 2023. By way of Decision Ref. No. 2500/OE/2023 of 26 October 2023, the Marshal of the Katowice Province corrected a manifest error in the earlier decision relating to NIP (Tax Identification Number) and REGON (Industry Identification Number).

By way of Commission Implementing Decision (EU) 2022/2427 of 6 December 2022, the best available techniques (BAT) conclusions were established under Directive 2010/75/EU of the European Parliament and of the Council on industrial emissions, for common waste gas management and treatment systems in the chemical sector. Having reviewed the integrated permit held by the Company, the Marshal of the Katowice Province ruled on the need to adapt the integrated (IPPC) permit for the potassium nitrate and calcium nitrate production installation, by requesting the Authority to amend the decision within one year from the notice delivery date, i.e. by 19 June 2024, and to adapt the installation to the BAT requirements by 12 December 2026.

Integrated permit for the installation processing industrial-grade animal fats and vegetable oils into distilled fatty acids and stearin:

Grupa Azoty Zakłady Azotowe Chorzów S.A. used to operate an IPPC installation for the processing of industrial-grade animal fats and vegetable oils into distilled fatty acids and stearin. The following integrated (IPCC) permits were obtained for the installation:

- Decision of 22 August 2013 (1848/OS/2013),
- amendment to the Decision of 2 December 2014 (2769/OS/2014),
- amendment to the Decision of 21 March 2017 (904/OS/2017).

As the unit ceased to operate pursuant to Resolution No. 10/10/2018 of the Management Board of Zakłady Azotowe Chorzów S.A. of 22 October 2018, and the Supervisory Board of Grupa Azoty Zakłady Azotowe Chorzów S.A. subsequently resolved to permanently discontinue the oleochemical production business - Resolution No. 24/2022 of 25 May 2022., the Marshal of the Katowice Province issued Decision Ref. No. 2463/OE/2023 of 7 July 2023 declaring the expiry of the integrated permit for that installation.

2. Other environmental decisions held by Grupa Azoty Zakłady Azotowe Chorzów S.A. of Chorzów:

- 2.1. Permit to conduct waste recovery operations outside of installations (slag, waste code: ex 10 01 01) - Decision by the Mayor of Chorzów of 22 March 2017, No. 5/2017, as amended by Decision No. 2/2020 of 24 February 2020, Decision of 9 August 2023, Ref. No. UE-III.6233.6.D.2023AK3 (valid until 31 March 2027).
- 2.2. Decision by the Marshal of the Katowice Province of 5 July 2019 No. 1823/OS/2019 whereby a substance in the form of distillation residues of fatty acids from the processing of industrial-grade animal fats is considered a by-product which can be used as a fuel in the oil-fired boiler house (valid until 4 July 2029).
- 2.3. Decision No. 3066/OS/2021 of 10 September 2021 concerning the release of gases and particulate matter into the air granted for a urease inhibitor production unit (valid until 9 September 2031).
- 2.4. Decision by the Marshal of the Katowice Province of 25 October 2023 No 3892/OE/2023 for waste generation from a urease inhibitor production unit (valid until 25 October 2033).

2.5. On 9 June 2020, the Company filed a request with the State Water Management Agency (PGW Wody Polskie) - the Regional Water Management Authority of Gliwice for a water-law permit for the introduction of treated municipal wastewater, being a mixture of sanitary wastewater, industrial wastewater, rainwater or meltwater, from the Company's premises, as well as rainwater or melt water from the City of Siemianowice Śląskie, into the Rów Michałkowicki watercourse. A negative decision was issued (decision of the Head of the Regional Water Management Authority of Gliwice of 7 June 2021, Ref. No. GL.RUZ.4210.116m.2020.BS), which was revoked by a higher-level authority - President of the State Water Management Agency (Decision of 29 December 2021, Ref. No. KUZ.4210.27.2.2021.KB) and submitted for re-examination. Following the re-examination, the Company was refused a water-law permit - decision of the Head of the Regional Water Management Authority of Gliwice of 31 August 2021, GL.RUZ.4210.116m.2020.BS (the decision is incorrectly dated - the year should be 2022, as confirmed by the date of receipt of correspondence by the Company). By letter of 14 September 2022, an appeal was lodged against the decision. By way of Decision No. 11/2023/KUZ of 7 February 2023, Ref. No. KUZ.421941.2022.EB, the President of the State Water Management Agency revoked in its entirety the decision of the Head of the Regional Water Management Authority of Gliwice, submitting the case for re-examination. By letter of 22 May 2023, the Head of the Regional Water Management Authority of Gliwice called on the Company to provide relevant information and explanations. The relevant information was provided by letter of 6 June 2023. Subsequently, the Authority notified the parties of closing the proceedings - by letter dated 20 June 2023, informing them of its intention to discontinue the procedure for granting a water-law permit for the introduction of wastewater into the Rów Michałkowicki watercourse as irrelevant. On 28 July 2023, the Company received the Head of the Regional Water Management Authority of Gliwice's Decision of 21 July 2023, Ref. No. GL.RUZ.4210.116m. 2020.BS, discontinuing the procedure as irrelevant. Accordingly, by letter of 7 August 2023, an appeal was lodged against the decision to the President of the State Water Management Agency under the provisions of the Code of Administrative Procedure. Subsequently, a request was filed to suspend the appeal procedure - by letter of 22 September 2023, pending an opinion from the Marshal of the Katowice Province regarding existence of the obligation to hold an integrated (IPPC) permit for the Company's on-site wastewater treatment facility. After receiving the Marshal of the Katowice Province's opinion stating there was no requirement to hold an integrated permit for the wastewater treatment facility, the President of the State Water Management Agency was requested by letter of 29 November 2023, Ref. No. MŚ/4/23, to resume the procedure, with additional evidence furnished, including the Marshal's opinion.

Reporting period: 2023

2. General information		
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Is the project materially compliant with all relevant EBRD Performance Requirements (taking account of agreed action plans, exemptions or derogations)?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	If NO, please provide details of any material non-compliances:
Is the project materially compliant with all applicable environmental and social laws and regulations?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	If NO, please provide details of any material non-compliances:
Have there been any accidents or incidents that have caused damage to the environment, brought about injuries or fatalities, affected project labour or local communities, affected cultural property, or created liabilities for the company?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	If YES, please describe, including details of actions to remedy and prevent reoccurrence:

<p>Have there been any changes to environment, social, labour or health and safety laws or regulations that have materially affected the Company?</p>	<p>Yes [X] No []</p>	<p><u>II. Social policy and labour law:</u></p> <ol style="list-style-type: none"> 1. Regulation of the Council of Ministers of 13 September 2022 on the minimum remuneration for work and minimum hourly wage rate in 2023. 2. New amounts of contributions to the Company Social Benefits Fund, effective from 1 July 2023. 3. New rules for the filing of tax returns and applications - new PIT2(9) tax form. 4. The provisions of the Act of 1 December 2022 Amending the Labour Code and Certain Other Acts introduced into the Labour Code new regulations pertaining to remote work (entry into force: 7 April 2023) and the employer's right to perform preventive tests for the presence of alcohol or substances with similar effects in an employee's body (entry into force: 21 February 2023). 5. Amendment to the Labour Code of 26 April 2023 Implementation of: <ul style="list-style-type: none"> - Directive (EU) 2019/1152 of the European Parliament and of the Council of 20 June 2019 on transparent and predictable working conditions in the European Union (OJ L 186, 11.07.2019, p. 105), - Directive (EU) 2019/1158 of the European Parliament and of the Council of 20 June 2019 on work-life balance for parents and carers and repealing Council Directive 2010/18/EU (OJ L 188, 12.07.2019, p. 79). 6. Increase in domestic business travel allowance. 7. Employee Capital Plan - obligation to inform staff of automatic re-enrolment. 8. Regulation of the Minister of Family and Social Policy of 18 October 2023 amending the Regulation concerning safety and health requirements for workstations with display screen equipment (Dz.U. 2023 item 2367)
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<p>How many inspections did you receive from the environmental authorities during the reporting period?</p>	<p>Number: 2</p>	<p>Please provide details of these visits, including number and nature of any violations found:</p> <p>In October/November 2023, an inspection was carried out to check compliance with rules for the prevention of major industrial accidents (SEVESO-UTE). The inspection was carried out by officers of the Provincial Headquarters of the State Fire Service in Katowice.</p> <p>By letter of 4 December 2023, Ref. No. IN.I.7023.266.2023.KG, the Provincial Inspectorate for Environmental Protection (WIOŚ) of the Katowice Province notified the Company of its intention to carry out inspections covering compliance with environmental regulations and administrative decisions - air emissions. The inspection commenced on 27 December 2023 and was not completed by the end of 2023.</p>
<p>How many inspections did you receive from the health and safety authorities during the reporting period?</p>	<p>Number: 2</p>	<p>Please provide details of these visits, including number and nature of any violations found:</p> <p>Inspection by the Municipal Headquarters of the State Fire Service in Chorzów relating to fire safety. The inspection was concluded by signing an inspection report on 20 October 2023.</p> <p>Inspection by the National Sanitary Inspectorate of the Chorzów County carried out in June 2023. The inspection covered matters related to occupational health and safety at individual facilities where work was performed.</p>
<p>How many inspections did you receive from the labour authorities during the reporting period?</p>	<p>Yes <input checked="" type="checkbox"/></p> <p>Number: 1</p> <p>No <input type="checkbox"/></p>	<p>Employees with accrued holiday entitlement were obligated to take the holiday leave in accordance with the Labour Code and their holiday schedule. The HR Policy Department was obligated to disburse a payment in lieu of holiday leave accrued on termination of an employment contract.</p>
<p>Have these visits resulted in any penalties, fines and/or corrective action plans?</p>	<p>Yes <input type="checkbox"/></p> <p>No <input checked="" type="checkbox"/></p>	<p>If YES, please describe, including status of implementing corrective actions to address any violations found:</p>
<p>Has the Company engaged any contractors for project-related work in the reporting period?</p>	<p>Yes <input type="checkbox"/></p> <p>No <input checked="" type="checkbox"/></p>	<p>If YES, please state for which types of work, and how the Company has monitored the compliance of contractors with EBRD Performance Requirements and the Environmental and Social Action Plan:</p>
<p>Were any of the violations stated above the responsibility of contractors?</p>	<p>Yes <input type="checkbox"/></p> <p>No <input checked="" type="checkbox"/></p>	<p>If YES, please provide details, including how the Company is ensuring that corrective actions are implemented by the contractor?</p>
<p>Have any operations been reduced, temporarily suspended or closed down due to environmental, health, safety or labour reasons?</p>	<p>Yes <input type="checkbox"/></p> <p>No <input checked="" type="checkbox"/></p>	<p>If YES, please describe:</p>

Please describe any environment or social programmes, initiatives or sub-projects undertaken during the reporting period to improve the Company's environmental or social performance and/or management systems:

In October 2023, the certification body TUV NORD Polska Sp. z o.o. carried out a recertification audit at the Company for compliance with the PN-EN ISO 9001:2015 and PN-EN ISO 14001:2015 standards. The audit was completed with positive results.

Please indicate the level of associated expenditure (capital expenditure and operating expenditure), and whether this relates to the requirements of the Environmental and Social Action Plan, or to any other initiative:

PLN 18,000.00 (VAT exclusive) (expenditure related to the recertification audit of the ISO 9001 and ISO 14001 systems).

3. Status of the Environmental and Social Action Plan

Please provide information on the status of each item in the Environmental and Social Action Plan (ESAP) agreed with EBRD. If the ESAP was updated during the reporting period, please attach a copy of the new plan.

4. Environmental Monitoring Data for each of the key subsidiaries

The information required in this section can be extracted from a CSR report, or a full CSR report can be attached.

Please provide the name and contact details for your environmental manager:			Grupa Azoty Zakłady Azotowe Chorzów S.A. 1. General environmental protection area: Magdalena Karpierz Environmental Protection Officer Mobile: (+48) 664 383 575 email: sprowisko.zach@grupaazoty.com ; 2. Specific area relating to water and wastewater management: Patryk Jankowski Head of Asset and Utility Management Department Mobile: (+48) 506 286 598 Email: patryk.jankowski@grupaazoty.com	
Parameter ²	Amount ³	Unit	Compliance Status ⁴	Comments ⁵
Wastewater				
Total wastewater	219.1	m ³ /d	535 m ³ /d	
Biochemical Oxygen Demand (BOD5)	3.5	mgO ₂ /l	25	
Chemical Oxygen Demand (COD)	37.25	mgO ₂ /l	125	
Total suspended solids	15.33	mg/l	35	

Total phosphorus	0.67	mg/l	10				
Ammoniacal nitrogen	0.39	mg/l	10				
Nitrate nitrogen	13.45	mg/l	30				
Nitrite nitrogen	0.26	mg/l	1				
Total nitrogen	19.99	mg/l	30				
Chlorides	181.67	mg/l	1000				
Sulfates	78.83	mg/l	500				
Petroleum hydrocarbons	0.1	mg/l	15				
Heavy metals	-	mg/l					
TOC	14.49						
[Other]	9.07		6.5-9	pH			
Air emissions	Per each major point source Boilers				mg/Nm³ in mg/m³_u	Permissible emission limit	Not applicable to the project
	K2	K3	K4	K5	mg/m³_u	mg/m³_u	
SO ₂	667.5	725	1,269.5	1,060.5	mg/m ³ _u	K2 = 850 K3 = 850 K4 = 1500 K5 = 1300	On an O ₂ content in flue gas basis (K2 and K3 - 3%, K4 and K5 - 6%)
Nitrogen oxides (NO _x)	319	358.5	299.5	294	mg/m ³ _u	400	
PM	20.9	12.3	74.5	77	mg/m ³ _u	K2 = 50 K3 = 50 K4 = 100 K5 = 100	
CO	210.75	127.65	292.5	344	mg/m ³ _u	---	
CO ₂	316,931.5	311,924	254,468	263,734.5	mg/m ³ _u	---	
BaP	-	-	0.000006	0.00055	mg/m ³ _u	---	---
carbon black	-	-	14.65	26.9	mg/m ³ _u	---	---
Other parameters							
Noise emissions	Noise emission measurements are performed once every two years. No such measurements were performed in 2023.				L _{Aeg} [dBA]	45-55	Noise does not exceed permitted levels

Solid waste

Please provide details of the types and amounts of solid wastes generated by the project. Indicate where wastes are classified as hazardous. Indicate the final re-use, recycle or disposal method for each waste type.

No.	Waste code	Waste type	Weight of waste generated [Mg/year]
1	06 10 02*	Wastes containing hazardous substances	52.30
2	06 10 99	Wastes not otherwise specified	193.58
3	07 06 12	Sludges from onsite effluent treatment other than those mentioned in 07 06 11	23.08
4	10 01 01	Bottom ash, slag and boiler dust (excluding boiler dust mentioned in 10 01 04)	361.00
5	15 01 01	Paper and cardboard packaging	1.565
6	15 01 02	Plastic packaging	7.581
7	15 01 10*	Packaging containing residues of or contaminated by hazardous substances	12.277
8	15 02 02*	Absorbents, filter materials (including oil filters not otherwise specified), wiping cloths,	1.440

		protective clothing contaminated by dangerous substances (e.g. PCB)	
9	16 02 14	Discarded equipment other than that mentioned in 16 02 09	0.205
10	17 02 04*	Glass, plastic and wood containing or contaminated with dangerous substances (e.g. wooden sleepers)	20.80
11	17 04 02	Aluminium	7.66
12	17 04 05	Iron and steel	208.96
13	17 04 11	Cables other than those mentioned in 17 04 10	0.83
14	17 09 04	Mixed construction and demolition wastes other than those mentioned in 17 09 01, 17 09 02 and 17 09 03	6.94

An asterisk (*) is used to denote hazardous waste.

All waste is recovered or disposed of by external contractors.

Furthermore, non-hazardous waste designated with code 10 01 01 is used for surface paving on GA ZACH S.A.'s premises, which is consistent with the terms of the permit held by the Company.

5. Resource Usage and Product Output

Parameter	Amount	Measurement Unit	Comments ⁶
Fuels used	29.63	Mg	Heavy fraction (boiler house) and gasoline, diesel oil, LPG - total for all departments
Crude oil	---	---	---
Natural gas	0.0	thousand m ³	---
Hard coal	3,382.23	Mg	---
Lignite	---	---	---
Grid electricity	2,440.746	MWh	---
Heat purchased from external sources	---	---	---
Feedstocks and raw materials used			
Nitric acid	---	Mg	---
Potassium carbonate	---	Mg	---
Animal fat	---	Mg	---
Quick lime	---	Mg	---
Hydrated lime	---	Mg	---
Other feedstocks for crystalline NPK fertilizers	---	Mg	---
Other feedstocks for liquid NPK fertilizers	---	Mg	---
Product output			
Potassium nitrate	---	Mg	---
Calcium nitrate	---	Mg	---
Crystalline NPK fertilizers	---	Mg	---
Liquid NPK fertilizers	---	Mg	---
Stearin	---	Mg	---
Glycerine	---	Mg	---

6. Human Resources management

Please provide the name and contact details for your Human Resources manager:		Magdalena Czajkowska Head of HR Department mobile (+48) 575 100 182 Email: magdalena.czajkowska@grupazoty.com	
	Total	Recruited in this reporting period	Terminated in this reporting period
Number of direct employees:	115	10	17
Number of contracted workers:	-	-	-
Were there any collective redundancies during the reporting period?	Yes [] No [X]	If YES, please describe the redundancy plan, including reasons for redundancies, number of workers involved, how they were selected, consultation undertaken, and measures to mitigate the effects of redundancy:	
Are any redundancies to the workforce planned for the next year?	Yes [] No [X]	If YES, please describe the redundancy plan, including reasons for redundancies, number of workers involved, and selection and consultation process:	
Were there any changes in trade union representation at Company plants during the reporting period?	Yes [X] No []	Changes on the trade union's board - two persons resigned from serving on the four-member board - currently the board consists of two members	

Were there any other worker representatives (e.g. in the absence of a trade union)?	Yes [] No [X]	If YES, please provide details and summarise engagement with them during the reporting period:
Were there any changes in the status of Collective Agreements?	Yes [] No [X]	If YES, please provide details:
Have employees raised any grievances with the project during the reporting period?	Yes [] No [X]	If YES, please state how many, split by gender, summarise the issues raised in grievances by male and female staff and explain how the Company has addressed them:
Have employees raised any complaints about harassment or bullying during the reporting period?	Yes [X] No []	Complaint about workplace bullying raised by a female employee (December 2023) The Management Board appointed an anti-bullying committee, which did not confirm the alleged bullying behaviour. In order to improve communication and investigate the sources of the conflict, the Company is in the process of implementing remedial measures - the appointment of an external mediator.
Have there been any strikes or other collective disputes related to labour and working conditions at the Company in the reporting period?	Yes [] No [X]	If YES, please summarise nature of, and reasons for, the disputes and explain how they were resolved:
Have there been any court cases related to labour issues during the reporting period?	Yes [] No [X]	If YES, please summarise the issues contested and outcome:
Have there been any changes to the following policies or terms and conditions during the reporting period in any of the following areas: <ul style="list-style-type: none"> - Trade union recognition - Collective Agreements - Non-discrimination and equal opportunities for all - Equal pay for equal work - Gender equality - Bullying and harassment, including sexual harassment - Employment of young workers under 18 - Wages and salaries (for regular and overtime hours) - Overtime - Working hours - Flexible working / work-life balance - Grievance mechanism for workers - Health & safety 	Yes [X] No []	In accordance with the Act Amending the Labour Code - the Work Rules and Remuneration Rules were updated, and an Internal Order on Occasional Remote Work was implemented.
7. Occupational Health and Safety Data		

Please provide the name and contact details for your Health and Safety manager:		Paweł Polak Chief OHS Officer Firefighting technical specialist Civil Defence Officer SEVESO Coordinator Mobile: (+48) 664 414 431 Email: pawel.polak3@grupaaazoty.com			
	Direct employees	Contracted workers		Direct employees	Contracted workers
Number of man-hours worked in this reporting period:	181,383	0	Number of fatalities ⁷ :	0	0
Budget spent on OHS in this period (total amount and currency):	PLN 338,356.38	0	Number of disabling injuries:	0	0
OHS training provided in this period in person-days:	78 persons/ 26 days	0	Number of Lost Time Incidents (including vehicular):	2	0
Number of lost workdays resulting from incidents:	106 calendar days	0	Number of cases of occupational disease:	0	0
Number of sick days:	1,154 calendar days (with sick leave allowance paid by the Employer) 2,280 days (with sick leave allowance paid by the Employer + Social Insurance Institution (ZUS))	0			
Accident causes (falling from height, carrying heavy loads, struck by a falling object, contact with a flame or a hot/burning object/environment, etc.): <ul style="list-style-type: none"> • startled by an unexpected event while working, • work performed in a forced body position while operating machinery and equipment, • noise coming from a further part of the hall, • shift work, including night-time work, • bodily characteristics of the injured person, 					
Please provide details of any fatalities or major accidents that have not previously been reported to EBRD, including total compensation paid due to occupational injury or illness (amount and currency): <p style="text-align: center;">not applicable</p>					

Please summarise any emergency prevention and response training that has been provided for Company personnel during the reporting period:

Fire prevention and fire safety training, SEVESO-UTE training, based on training programmes approved by the Employer, provided on a regular basis as part of induction and periodic training.

Please summarise any emergency response exercises or drills that have been carried out during the reporting period:

In-house evacuation drills, including an alert sounded using an alarm siren and short text messages, covering production staff.

8. Stakeholder Engagement

Please provide the name and contact details for your external relations or community engagement manager:

Dariusz Szeja
QMS Officer
mobile: (+48) 538 894 304
email:
dariusz.szeja@grupaazoty.com

Please provide information on the implementation of the Stakeholder Engagement Plan agreed with EBRD and summarise interaction with stakeholders during the reporting period, including:

- meetings or other initiatives to engage with members of the public or public organisations during the reporting period
- information on environmental protection, social policy and safety matters provided to the local community and other stakeholders during the reporting period:
- coverage in the media:
- interaction with any environmental or other community groups.

Please describe any changes to the Stakeholder Engagement Plan (SEP) agreed with EBRD:

Grupa Azoty Zakłady Azotowe Chorzów S.A. has no Stakeholder Engagement Plan in place.

How many complaints or grievances did the project receive from members of the public or civil society organisations during the reporting period? Please split by stakeholder group. Summarise any issues raised in the complaints or grievances and explain how they were resolved:

There were no such issues.

9. Community Development

Please summarise any social or community development / investment initiatives undertaken by the Company during the reporting period, and any associated expenditure:

GA ZACH S.A. has partnered with the Starochozowska Fundacja Zdrowia foundation, which performs medical check-ups of its employees as part of preventive healthcare.

ENVIRONMENTAL AND SOCIAL ACTION PLAN

Table 0.1 Wista Project, Grupa Azoty Poland - Environmental, Social, Health and Safety (ESHS) matters, Updated (Alchemist Project)
Action Plan:

GRUPA AZOTY ZAKŁADY AZOTOWE CHORZÓW S.A.

6. Actions required to maintain compliance with EHS requirements of national law and EU environmental standards - GRUPA AZOTY ZAKŁADY AZOTOWE CHORZÓW S.A.							
No.	Action	Environmental risks, liabilities/benefits	Legislative requirements/Best practice	Requirement/Resources	Schedule completion - action to be completed by end of year	Target and evaluation criteria for implementation progress	Comments
0.1	Objective to achieve the same safety performance as in 2018 (when no accidents at work occurred).	OHS and fire safety control of individual areas with respect to potential risks affecting the pursuit of business objects.	Requirements under the OHS and fire safety regulations, good practice, internal regulations.	Internal resources available for supervision, control and documentation (not applicable to material agents).	In accordance with the Plans approved by the Company's Management	Conduct business in accordance with the applicable laws and regulations, as well as established standards and practice adequate to the business profile and adjacent infrastructure.	It is necessary to secure adequate financial resources for the implementation of specific actions.

0.2	Maintain and further develop the existing management systems. Improve OHS and fire safety infrastructure.	Fostering solid patterns and attitudes confirmed by appropriately implemented and supervised management systems applicable in each area, i.e. OHS, fire safety and environmental protection.	Legal requirements. Best practice.	Internal resources available for supervision, control and documentation (not applicable to material agents).	As needed.	Certification of systems and raising staff awareness - on an as needed basis.	---
0.4	Incur expenditure to perform the Company's OHS, fire safety and environmental obligations.	Securing adequate financial resources that will allow the Company to perform its obligations, including the pursuit of its business objects.	Requirements under the applicable laws, regulations, EU directives and administrative decisions.	Internal resources/ specialised external entities.	As needed.	Regular monitoring of implementation.	---
6.1	Preparation/update/monitoring of the Upper-Tier Establishment documentation.	Update of legal compliance status concerning prevention of major industrial accidents.	Legal requirements relating to prevention of major industrial accidents under the Environmental Protection Law.	Internal resources/ specialised external entities.	Completed in the third quarter of 2021 / approved in November 2021	UTE documentation approved by competent authorities (Provincial Headquarters of the State Fire Service in Katowice and Provincial Inspectorate for Environmental Protection in Katowice)	COMPLETED Subject to regular monitoring

1. Information about the Company	
Company Name: Grupa Azoty Jednostka Ratownictwa Chemicznego Sp. z o.o.	
Company Address: ul. Kwiatkowskiego 8, 33-101 Tarnów	
Country: Poland	
Town/Location: Tarnów	
Company authorised representative: I certify that the data contained in this report completely and accurately represents the Company's operations during the reporting period. Signature:	
Title: President of the Management Board	Date: 30 April 2024
Contact Details:	
Telephone: (+48)/14/637 27 30	
Mobile:	
Email: Leszek.Gniadek@grupazoty.com	

Please provide key data on the Company performance, as well as production levels at each plant. For each of the 7 large plants please provide:

Item (PLN '000)	Cumulative	
	2022	2023
Revenue	64,473	85,935
Profit/(loss) on sales	9,477	8,808
EBIT	7,254	6,272
EBITDA	10,458	11,242
Net profit/(loss)	6,129	4,796

Data from the Company's separate financial statements

Key performance indicators in terms of energy consumption, emissions, use of natural resources, and carbon dioxide emissions;
Number of staff employed and any change in employment over past 3 years

	As at 31 Dec 2021	As at 31 Dec 2022	As at 31 Dec 2023
Number of direct employees:	268	270	268
Number of contracted workers:	3	3	3

Provide information on permits and each subsidiary's compliance status with IPPC/IED (*Integrated Pollution Prevention and Control Directive/Industrial Emissions Directive*)

Reporting period: 2023

- Decision by the Governor of the Opole Province dated 13 December 2006, Ref. No. ŚR.III.AS-6610-1-30/06, as amended, granting an integrated (IPPC) permit to operate installations manufacturing, with the use of chemical processes, organic chemistry products and semi-finished products, i.e.

WAXES, MELAMINE RESIN, and VARIOUS ORGANIC PRODUCTS,

- Decision by the Governor of the Kraków Province dated 27 April 2007, Ref. No. ŚR.XI.AJ.6663-11-06, as amended, granting an integrated (IPPC) permit for the 'Czajki I and II' landfill site,

- Decision by the Governor of the Kraków Province dated 25 April 2007, Ref. No. ŚR.XI.AJ.6663-6-06, as amended, granting an integrated (IPPC) permit for the 'Za Rzeką Białą' landfill site,

- Decision by the Governor of the Kraków Province dated 24 May 2007, Ref. No. ŚR.XI.AJ.6663-10-06, as amended, granting an integrated (IPPC) permit for the 'AN II' landfill site.

- Decision by the Marshal of the Kraków Province dated 18 May 2022, Ref. No. SR-III-7222.19.2021.AG, granting an integrated (IPPC) permit for the following installations - landfill cell sector AB-5 for code 17 06 05* hazardous waste - construction materials containing asbestos, within the 'Za Rzeką Białą' landfill site in Tarnów at ul. Czysta.

- Decision by the Marshal of the Kraków Province dated 25 September 2023, Ref. No. SR-III.7222.20.2022.NW, granting an integrated (IPPC) permit for the installation for recovery or disposal of hazardous waste based on a physico/chemical treatment process, with a daily capacity of more than 10 tonnes, i.e. installation for the processing of hazardous waste generated in the course of demolition of industrial facilities (Mercury Electrolysis Plant facilities).

Reporting period:2023

2. General information		
Is the project materially compliant with all relevant EBRD Performance Requirements (taking account of agreed action plans, exemptions or derogations)?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>]	If NO, please provide details of any material non-compliances:
Is the project materially compliant with all applicable environmental and social laws and regulations?	Yes [<input checked="" type="checkbox"/>] No [<input type="checkbox"/>]	If NO, please provide details of any material non-compliances:
Have there been any accidents or incidents that have caused damage to the environment, brought about injuries or fatalities, affected project labour or local communities, affected cultural property, or created liabilities for the company?	Yes [<input type="checkbox"/>] No [<input checked="" type="checkbox"/>]	If YES, please describe, including details of actions to remedy and prevent reoccurrence:

<p>Have there been any changes to environment, social, labour or health and safety laws or regulations that have materially affected the Company?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>If YES, please describe:</p> <p>ENVIRONMENTAL PROTECTION</p> <ul style="list-style-type: none"> - Regulation of the Minister of Climate and Environment of 17 November 2023 amending the Regulation on the mechanical and biological processing of non-segregated (mixed) municipal waste (Dz.U. item 2524). - Regulation of the Minister of Climate and Environment of 9 December 2022 on the operation of a database on products and packaging and on waste management (Dz.U. of 2023, item 1). - Regulation of the Minister of Climate and Environment of 7 September 2021 on the requirements with respect to measurement of emissions (consolidated text: Dz.U. of 2023, item 1706). - Public Notice of the Minister of Climate and Environment of 4 August 2023 on the rates of environmental fees for 2024 (M.P. of 2023, item 914, as amended). - Resolution No. 96 of the Council of Ministers of 12 June 2023 on the National Waste Management Plan 2028 (M.P. of 2023, item 702). - Regulation of the Minister of the Environment of 6 February 2015 on the use of municipal sewage sludge (Dz.U. of 2023, item 23).
<p>How many inspections did you receive from the environmental authorities during the reporting period?</p>	<p>Number: 8</p>	<p>Please provide details of such inspections, including the number and nature of any violations found:</p>

	<p>1) Inspection by the Kraków Provincial Inspectorate for Environmental Protection - Tarnów Branch, carried out on 16 November 2022 - 16 May 2023.</p> <p><u>Type of installations (operations) inspected:</u> - 'Za Rzeką Białą' landfill site, ul. Czysta (no number), 33-100 Tarnów.</p> <p><u>Purpose of the inspection:</u> - Inspection of compliance with the landfill operator obligations.</p> <p><u>The following violations were found:</u> Processing by disposal of hazardous waste received from the Communal Association of Lubartów Region Municipalities - Waste Management Plant, Wólka Rokicka 100, 21-100 Lubartów, at the 'Za Rzeką Białą' landfill cap (sector D-1) on 16 November 2022 without holding the required permit.</p> <ul style="list-style-type: none">- Violation of Art. 41 of the Waste Act of 14 December 2012 (Dz.U. of 2023, item 1587, as amended),- Violation of Decision of the Marshal of the Kraków Province, Ref No. ŚR. XI. Aj.6663-6-06 of 25 April 2007 granting an integrated (IPPC) permit for the 'Za Rzeką Białą' landfill site. <p>Following the inspection carried out between 16 November 2022 and 16 May 2023, the Company's representatives refused to sign the inspection report and submitted their position in writing. Waste with code 19 05 99 coming from the Plant, classified as per the applicable waste catalogue as non-hazardous waste, was accepted for landfilling in accordance with the integrated permit held, and met the requirements specified in the waste description document allowing it to be landfilled. Accordingly, all the procedures and legal requirements imposed on the entity accepting waste for landfilling were complied with.</p> <p>2) Inspection by the Kraków Provincial Inspectorate for Environmental Protection - Tarnów Branch, carried out on 17 January 2023 - 17 January 2023.</p> <p><u>Type of installations (operations) inspected:</u> - waste management operations, ul. Kwiatkowskiego 8, 33-101 Tarnów.</p> <p><u>Purpose of the inspection:</u> - Inspection of compliance with the Waste Act of 14 December 2012 with respect to the performance of obligations imposed on waste managers (waste generators, collectors, processors, carriers, brokers, dealers and sellers).</p> <p><u>No violations were found.</u></p>
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	<p>3) Inspection by the Kraków Provincial Inspectorate for Environmental Protection - Tarnów Branch, carried out on 1 March 2023 - 8 March 2023.</p> <p><u>Type of installations (operations) inspected:</u> - 'Za Rzeką Białą' landfill site, ul. Czysta (no number), 33-100 Tarnów.</p> <p><u>Purpose of the inspection:</u> - Inspection of compliance with the Waste Act of 14 December 2012 with respect to the performance of obligations imposed on waste managers (waste generators, collectors, processors, carriers, brokers, dealers and sellers). - Inspection of compliance with the conditions regarding water abstraction volumes, as specified in relevant water-law permits and integrated (IPPC) permits. - Inspection of compliance with the conditions regarding the quality and quantity of wastewater introduced into water or into the ground, as specified in relevant water-law permits and integrated (IPPC) permits. - Inspection of compliance with environmental protection regulations with respect to emissions of gases and particulate matter into the air. - Inspection of compliance with environmental protection regulations with respect to noise emissions into the environment.</p> <p><u>No violations were found.</u></p>
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4) Inspection by the Kraków Provincial Inspectorate for Environmental Protection - Tarnów Branch, carried out on 21 March 2023 - 31 May 2023.

Type of installations (operations) inspected:

- Installation for recovery or disposal of hazardous waste based on a physico/chemical treatment process, with a daily capacity of more than 10 tonnes, ul. Kwiatkowskiego 8, 33-101 Tarnów.

Purpose of the inspection:

- Inspection of compliance with the Waste Act of 14 December 2012 with respect to the performance of obligations imposed on waste managers (waste generators, collectors, processors, carriers, brokers, dealers and sellers).

- Inspection of compliance with the conditions regarding water abstraction volumes, as specified in relevant water-law permits and integrated (IPPC) permits. - Inspection of compliance with the conditions regarding the quality and quantity of wastewater introduced into water or into the ground, as specified in relevant water-law permits and integrated (IPPC) permits. - Inspection of compliance with environmental protection regulations with respect to emissions of gases and particulate matter into the air.

- Inspection of compliance with environmental protection regulations with respect to noise emissions into the environment.

The Provincial Inspectorate for Environmental Protection issued a negative opinion on compliance with environmental protection regulations with respect to the installation for recovery or disposal of hazardous waste based on a physico/chemical treatment process, with a daily capacity of more than 10 tonnes, i.e. installation for the disposal of hazardous waste generated in the course of demolition of industrial facilities, designated as C-160 and D-160 (Mercury Electrolysis Plant facilities).

In connection with the foregoing, the Company refused to sign the inspection report. Relevant explanations were submitted by the Company in writing to the authority conducting the procedure for the issuance of an integrated (IPPC) permit. By way of Decision of 25 September 2023 Ref. No. SR-III.7222.20.2022.NW, the Marshal of the Kraków Province granted an integrated (IPPC) permit for the installation.

5) Inspection by the Kraków Provincial Inspectorate for Environmental Protection - Tarnów Branch, carried out on 7 June 2023 - 6 July 2023.

Type of installations (operations) inspected:

- waste management operations, ul. Czysta, 33-101 Tarnów.

	<p><u>Purpose of the inspection:</u></p> <ul style="list-style-type: none"> - Inspection of compliance with the Waste Act of 14 December 2012 with respect to the performance of obligations imposed on waste managers (waste generators, collectors, processors, carriers, brokers, dealers and sellers). - Inspection of compliance with the conditions regarding water abstraction volumes, as specified in relevant water-law permits and integrated (IPPC) permits. - Inspection of compliance with the conditions regarding the quality and quantity of wastewater introduced into water or into the ground, as specified in relevant water-law permits and integrated (IPPC) permits. - Inspection of compliance with environmental protection regulations with respect to emissions of gases and particulate matter into the air. <p><u>No violations were found.</u></p> <p>6) Inspection by the Kraków Provincial Inspectorate for Environmental Protection - Tarnów Branch, carried out on 4 September 2023 - 27 September 2023.</p> <p><u>Type of installations (operations) inspected:</u></p> <ul style="list-style-type: none"> - 'Za Rzeką Białą' landfill site, ul. Czysta (no number), 33-100 Tarnów. <p><u>Purpose of the inspection:</u></p> <ul style="list-style-type: none"> - Inspection of compliance with the landfill operator obligations. <p><u>No violations were found.</u></p> <p>7) Inspection by the Kraków Provincial Inspectorate for Environmental Protection - Tarnów Branch, carried out on 20 September 2023 - 30 October 2023.</p> <p><u>Type of installations (operations) inspected:</u></p> <ul style="list-style-type: none"> - 'Za Rzeką Białą' landfill site, ul. Czysta (no number), 33-100 Tarnów.
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	<p><u>Purpose of the inspection:</u></p> <ul style="list-style-type: none"> - Inspection of compliance with the Waste Act of 14 December 2012 with respect to the performance of obligations imposed on waste managers (waste generators, collectors, processors, carriers, brokers, dealers and sellers). - Inspection of compliance with the conditions regarding water abstraction volumes, as specified in relevant water-law permits and integrated (IPPC) permits. - Inspection of compliance with the conditions regarding the quality and quantity of wastewater introduced into water or into the ground, as specified in relevant water-law permits and integrated (IPPC) permits. - Inspection of compliance with environmental protection regulations with respect to emissions of gases and particulate matter into the air. <p><u>No violations were found.</u></p> <p>8) Inspection by the Kraków Provincial Inspectorate for Environmental Protection - Tarnów Branch, carried out on 13 November 2023 - 13 December 2023.</p> <p><u>Type of installations (operations) inspected:</u></p> <ul style="list-style-type: none"> - 'Czajki I and II' landfill site for non-hazardous and inert waste, - 'Za Rzeką Białą' landfill site, ul. Czysta (no number), 33-100 Tarnów. <p><u>Purpose of the inspection:</u></p> <ul style="list-style-type: none"> - Inspection of compliance with the Waste Act of 14 December 2012 with respect to the performance of obligations imposed on waste managers (waste generators, collectors, processors, carriers, brokers, dealers and sellers). - Inspection of compliance with the landfill operator obligations. - Inspection of waste landfill remediation process. <p><u>No violations were found.</u></p>
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<p>How many inspections did you receive from the health and safety authorities during the reporting period?</p>	<p>Number: 3</p>	<p>Please provide details of such inspections, including the number and nature of any violations found:</p> <p>Inspection by the County State Sanitary Inspectorate:</p> <p>Working conditions at TM Department (Packing and Storage Department) 30 March 2023, inspection report Reg. No. NHP 902018320233 2 orders were issued: to put up a no-smoking sign and to provide work environment measurements as part of occupational risk assessments.</p> <p>Working conditions at ST Department (Technical Maintenance and Services Department) 6 November 2023, inspection report Reg. No. NHP 9020134020233 2 oral recommendations were issued to complement occupational risk assessments.</p> <p>Removal of asbestos at ST Department (Technical Maintenance and Services Department) 7 December 2023, inspection report Reg. No. NHP 902029420233 No recommendations were issued.</p>
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How many inspections did you receive from the labour authorities during the reporting period?	Number: 1	Please provide details of such inspections, including the number and nature of any violations found: Inspection by the National Labour Inspectorate of Rzeszów: 30 August 2023, inspection report Reg. No. 120006 53 KO33 pt/23 No recommendations were issued.
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<p>Have these visits resulted in any penalties, fines and/or corrective action plans?</p>	<p>Yes <input checked="" type="checkbox"/>] No <input type="checkbox"/></p>	<p><u>Inspection 1</u></p> <p>Following an inspection carried out between 16 November 2022 and 16 May 2023 by the Provincial Inspectorate for Environmental Protection, the following violations were identified:</p> <ul style="list-style-type: none"> - violation of Art. 41 of the Waste Act of 14 December 2012, - violation of Decision of the Marshal of the Kraków Province dated 25 April 2007, Ref. No. ŚR.XI.AJ.6663-6-06, as amended, granting the Company an integrated (IPPC) permit for the 'Za Rzeką Białą' landfill site. <p>The Company's representatives refused to sign the inspection report and submitted their position and comments in writing.</p> <p>By letter dated 11 January 2024, Ref. No. TI.7062.1.3.2024.TN, the Kraków Provincial Inspector for Environmental Protection notified the Company that administrative proceedings had been initiated to impose a fine on the Company for waste management in breach of the permit held.</p> <p>No decision by the Kraków Provincial Inspector for Environmental Protection had been received by the date of this report.</p>
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Has the Company engaged any contractors for project-related work in the reporting period?	Yes [<input checked="" type="checkbox"/>]	If YES, please state for which types of work, and how the Company has monitored the compliance of contractors with EBRD Performance Requirements and the Environmental and Social Action Plan: Third-party contractors were engaged, among other things, to: – measure chemical concentrations in samples taken at work stations (not measured by the laboratory).
Were any of the violations stated above the responsibility of contractors?	Yes [<input type="checkbox"/> No [<input checked="" type="checkbox"/>]	If YES, please provide details, including how the Company is ensuring that corrective actions are implemented by the contractor?
Have any operations been reduced, temporarily suspended or closed down due to environmental, health, safety or labour reasons?	Yes [<input type="checkbox"/> No [<input checked="" type="checkbox"/>]	If YES, please describe:
Please describe any environment or social programmes, initiatives or sub-projects undertaken during the reporting period to improve the Company's environmental or social performance and/or management systems: -		
Please indicate the level of associated expenditure (capital expenditure and operating expenditure), and whether this relates to the requirements of the Environmental and Social Action Plan, or to any other initiative: -		

3. Status of the Environmental and Social Action Plan

Please provide information on the status of each item in the Environmental and Social Action Plan (ESAP) agreed with EBRD. If the ESAP was updated during the reporting period, please attach a copy of the new plan.
-

4. Environmental Monitoring Data for each of the key subsidiaries

The information required in this section can be extracted from a CSR report, or a full CSR report can be attached.

Please provide the name and contact details for your environmental manager:			Dagmara Dalida email: Dagmara.Dalida@grupazoty.com Telephone: (+48) 698 930 317; (+48)/14/637 27 30 extension 26	
Parameter ²	Amount ³	Unit	Compliance Status ⁴	Comments ⁵
Wastewater	-			
Total wastewater	-			
Biochemical Oxygen Demand (BOD5)	-			
Chemical Oxygen Demand (COD)	-			
Suspended solids	-			
Phosphorus	-			
Total nitrogen	-			
Heavy metals	-			
[Other]	-			

Air emissions	Per each major point source	Mg/Nm ³	- Notification concerning Paint shop - gas cylinder certification chamber, made by letter Ref. No. RZ/485/ZS/49/2022 of 1 March 2022. - Notification concerning Chemical Wastewater Treatment Plant, SO ₂ storage and distribution, tanker unloading/cylinder and container loading installations, made by letter Ref. No. RZ/2313/ZS/192/2020 of 22 October 2020. - Decision by the Governor of the Opole Province dated 13 December 2006 (No. ŚR.III.AS-6610-1-30/06, as amended) – integrated (IPPC) permit for installations manufacturing, with the use of chemical processes, organic chemistry products or semi-finished products, i.e. WAXES, MELAMINE RESIN and VARIOUS ORGANIC PRODUCTS in Kędzierzyn-Koźle.	
SO ₂	0.0144	Mg		
Nitrogen oxides (NO _x)	0.0147	Mg		
Total PM	0.0031	Mg		
CO ₂	248.021	Mg		
Carbon monoxide (CO)	0.0102	Mg		
Other parameters				
Non-methane volatile organic compounds (NMVOCs)	0.1148	Mg		
Ammonia	0.1879	Mg		
Particulate matter PM10	0.0027	Mg		
Particulate matter PM2.5	0.0027	Mg		
Ethylene glycol	0.000004	Mg		
Formaldehyde	0.0015	Mg		
Methanol	0.0003	Mg		
Methane	154.2374	Mg		
Furfuryl alcohol	0.0003	Mg		
[Other]	-	-		
Solid waste				
Please provide details of the types and amounts of solid wastes generated by the project. Indicate where wastes are classified as hazardous. Indicate the final re-use, recycle or disposal method for each waste type.				

Types and amounts of waste generated in 2023 (aggregate data)

No.	Waste code	Waste type	Weight of waste generated [Mg]	
			weight of waste	Disposal method
1.	10 01 15	Bottom ash, slag and boiler dust from co-incineration other than those mentioned in 10 01 14	22,210.89	Recovery R3/R5

2.	15 01 01	Paper and cardboard packaging	0.235	Transferred to third-party contractor
3.	15 01 02	Plastic packaging	3.18	Transferred to third-party contractor
4.	15 01 10*	Packaging containing residues of or contaminated by hazardous substances	0.014	Transferred to third-party contractor
5.	16 01 03	End-of-life tyres	1.7	Transferred to third-party contractor
6.	16 02 14	Discarded equipment other than that mentioned in 16 02 09 to 16 02 13	0.513	Transferred to third-party contractor
7.	17 04 05	Iron and steel	167.92	Transferred to third-party contractor
8.	17 06 05*	Construction materials containing asbestos	2,285.10	Disposal D5
9.	17 09 01*	Construction, renovation and demolition waste containing mercury	2530.7889	Disposal D9
10.	18 02 02*	Other wastes containing viable pathogenic microorganisms or their toxins, as well as other entities capable of transferring their genetic material, which are known or reasonably believed to cause disease in people or other living organisms	2.3982	Transferred to third-party contractor
11.	19 02 06	Sludges from physico/chemical treatment other than those mentioned in 19 02 05	23.1	Disposal D5
12.	19 03 05	Stabilised wastes other than those mentioned in 19 03 04	2,569.82	Disposal D5
13.	19 08 14	Sludges from non-biological treatment of industrial wastewater other than those mentioned in 19 08 13	481.28	Disposal D5

*hazardous waste

5. Resource Usage and Product Output

Parameter	Amount	Measurement Unit	Comments ⁶
Fuels used			
Crude oil	-	-	
Natural gas	9,140	m ³	
Hard coal	-	Mg	

Lignite	-	-	
Grid electricity	2,151,147	kWh	
Heat purchased from external sources	4,429.34	GJ	
Feedstocks and raw materials used			
Sulfur	35.0016	Mg	
Stearic acid	2.0695	Mg	
Urea	41.452	Mg	
Nafol	1.738	Mg	
Nansa	13.839	Mg	
Rosulfan (Sodium Lauryl Sulfate)	20.4	Mg	
Irgamet	0.083	Mg	
Butyl glycol	13.123	Mg	
Phosphoric acid	0.0244	Mg	
Monoethylene glycol	12.181	Mg	
Hydrogen peroxide	3.66	Mg	
Disodium versenate	0.04705	Mg	
Ammonia water	47.359598	Mg	
Aluminium sulfate	0.1404	Mg	
Yellow dextrin	5.5044	Mg	
Kaolin	5.6394	Mg	
H-40 hardener	4.5494	Mg	
Formalin	5.0	Mg	
Rofamin T	3.7957	Mg	
Base oil N-100	4.1632	Mg	
Silane (Dynasylan Ameo)	0.366	Mg	
99% technical-grade denatured ethanol	1.055	Mg	
furfuryl alcohol	40.48	Mg	
p-Toluenesulfonic acid 50%	0.964	Mg	
sodium hydroxide 100%	28.7577	Mg	
formic acid 85%	1.152	Mg	
Petrolatum	7.0795	Mg	
Walloxen T 190	0.218	Mg	
Ceralene 691 wax	3.407	Mg	
Topcoat paint	84	kg	
Primer	69.9	kg	
Solvent	45.65	kg	
Hardener	27.48	kg	
Topcoat enamel	4.8	kg	
Spray varnish	2.59	kg	
Product output			
DE-EMIS	265.50	Mg	
PROTEKTOL SAT	170.00	Mg	
H-50 HARDENER	5.00	Mg	
H-55 HARDENER	5.00	Mg	
Casting resin	49.38	Mg	
Anti-caking agent	44.64	Mg	
Sodium polysulfide	142.04	Mg	

6. Human Resources management

Please provide the name and contact details for your Human Resources manager: HR Officer		Katarzyna Kokoszka, Katarzyna.kokoszka@grupazoty.com	
	Total	Recruited in this reporting period	Terminated in this reporting period
Number of direct employees:	268	16	18
Number of contracted workers:	3	0	0
Were there any collective redundancies during the reporting period?	Yes [] No [X]	If YES, please describe the redundancy plan, including reasons for redundancies, number of workers involved, how they were selected, consultation undertaken, and measures to mitigate the effects of redundancy:	
Are any redundancies to the workforce planned for the next year?	Yes [] No [X]	If YES, please describe the redundancy plan, including reasons for redundancies, number of workers involved, and selection and consultation process:	
Were there any changes in trade union representation at Company plants during the reporting period?	Yes [] No [X]	If YES, please provide details, and summarise engagement with trade unions during the reporting period:	
Were there any other worker representatives (e.g. in the absence of a trade union)?	Yes [] No [X]	If YES, please provide details and summarise engagement with them during the reporting period:	
Were there any changes in the status of Collective Agreements?	Yes [] No [X]	If YES, please provide details:	
Have employees raised any grievances with the project during the reporting period?	Yes [] No [X]	If YES, please state how many, split by gender, summarise the issues raised in grievances by male and female staff and explain how the Company has addressed them:	
Have employees raised any complaints about harassment or bullying during the reporting period?	Yes [] No [X]	If YES, please state how many, split by gender, summarise the issues raised by male and female staff and explain how the Company has addressed them:	
Have there been any strikes or other collective disputes related to labour and working conditions at the Company in the reporting period?	Yes [] No [X]	If YES, please summarise nature of, and reasons for, the disputes and explain how they were resolved:	
Have there been any court cases related to labour issues during the reporting period?	Yes [] No [X]	If YES, please summarise the issues contested and outcome:	

<p>Have there been any changes to the following policies or terms and conditions during the reporting period in any of the following areas:</p> <ul style="list-style-type: none"> - Trade union recognition - Collective Agreements - Non-discrimination and equal opportunities for all - Equal pay for equal work - Gender equality - Bullying and harassment, including sexual harassment - Employment of young workers under 18 - Wages and salaries (for regular and overtime hours) - Overtime - Working hours - Flexible working / work-life balance - Grievance mechanism for workers - Health & safety 	<p>Yes [X] No []</p>	<p>If YES, please give details, including of any new initiatives:</p> <ul style="list-style-type: none"> - Pay agreement dated 10 February 2022 setting out the terms of the increase in base pay from 1 January 2023; - Supplement No. 7/2023 of 10 November 2023 to the Collective Bargaining Agreement for Employees of Grupa Azoty Jednostka Ratownictwa Chemicznego Sp. z o.o. of Tarnów - additional increase in the amount of contribution to the Company Social Benefits Fund in 2023.
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7. Occupational Health and Safety Data					
Please provide the name and contact details for your Health and Safety manager:		Edyta Bączek email: edyta.baczek@grupaazoty.com Tel.: (+48) 887 706 555; (+48)/14/63 72 730 extension 43			
	Direct employees	Contracted workers		Direct employees	Contracted workers
Number of man-hours worked in this reporting period:	435,800	0	Fatalities ⁷ :	0	0
Budget spent on OHS in this period (total amount and currency):	PLN 710,399	0	Number of disabling injuries:	0	0
OHS training provided in this period in person-days:	119	0	Number of Lost Time Incidents (including vehicular):	4	0
Number of lost workdays resulting from incidents:	234	0	Number of cases of occupational disease:	0	0
Number of sick days:	0	0			

Accident causes (falling from height, carrying heavy loads, struck by a falling object, contact with a flame or a hot/burning object/environment, etc.): Leg injury sustained during movement, injuries during manual transport *3
Please provide details of any fatalities or major accidents that have not previously been reported to EBRD, including total compensation paid due to occupational injury or illness (amount and currency): None
Please summarise any emergency prevention and response training that has been provided for Company personnel during the reporting period: Staff awareness campaign on the prevention of accidents during movement
Please summarise any emergency response exercises or drills that have been carried out during the reporting period: Evacuation of staff from a building, workshop on the use of firefighting equipment.

8. Stakeholder Engagement	
Please provide the name and contact details for your external relations or community engagement manager:	
Please provide information on the implementation of the Stakeholder Engagement Plan agreed with EBRD and summarise interaction with stakeholders during the reporting period, including: <ul style="list-style-type: none"> – meetings or other initiatives to engage with members of the public or public organisations during the reporting period – information on environmental protection, social policy and safety matters provided to the local community and other stakeholders during the reporting period: – coverage in the media: – interaction with any environmental or other community groups. Please describe any changes to the Stakeholder Engagement Plan (SEP) agreed with EBRD:	
How many complaints or grievances did the project receive from members of the public or civil society organisations during the reporting period? Please split by stakeholder group. Summarise any issues raised in the complaints or grievances and explain how they were resolved:	

9. Community Development
Please summarise any social or community development / investment initiatives undertaken by the Company during the reporting period, and any associated expenditure:
Social and sponsorship activities
In 2023, as part of the Plan of social and sponsorship activities, promotion and advertising contracts were concluded for the total amount of PLN 11,200, supporting: <ul style="list-style-type: none"> – cultural activities, – protection of life and health and assistance for persons with disabilities, – social campaigns.
Donations
In 2023, acting in accordance with its Donation Policy, Grupa Azoty JRCh Sp. z o.o. made donations totalling PLN 12,500 for: <ul style="list-style-type: none"> - charity, - science, higher education, schooling, and education systems, - other.

ENVIRONMENTAL AND SOCIAL ACTION PLAN

Table 0.1 Wisła Project, Grupa Azoty Poland - Environmental, Social, Health and Safety (ESHS) matters, Updated (Alchemist Project) Action Plan:

GRUPA AZOTY JRCH SP. Z O.O.

8. Actions required to maintain compliance with EHS requirements of national law and EU environmental standards – JRCh Jednostka Ratownictwa Chemicznego (Tarnów/Kędzierzyn)							
No.	Action	Environmental risks, liabilities/benefits	Legislative requirements/ Best practice	Requirement/ Resources	Scheduled completion - action to be completed by end of year	Target and evaluation criteria for implementation progress	Comments
8.1	Monitoring environmental impacts of the operating production unit (Chemzak in Kędzierzyn) Reference to BAT requirements.	Record consumption of raw materials, fuels and energy, air emissions, water consumption, and amounts of generated waste Regularly evaluate operational efficiency to minimize resource consumption and waste generation	Legislative obligation, best practice/internal resources	Internal resources	Ongoing/ad-hoc and periodic reports	Summary in the annual report for the Bank	
<p>Information: Consumption of raw materials, fuels and energy, air emissions, water consumption, and amount of generated waste are recorded. The process units are regularly evaluated for efficiency to minimise raw material consumption and waste generation. The environmental impact of the process units is monitored in accordance with the integrated (IPPC) permit.</p> <p>Requirements: - Decision by the Governor of the Opole Province dated 13 December 2006 No. ŚR.III.AS-6610-1-30/06, as amended – integrated (IPPC) permit for installations manufacturing, with the use of chemical processes, organic chemistry products or semi-finished products, i.e. WAXES, MELAMINE RESIN and VARIOUS ORGANIC PRODUCTS, located in Kędzierzyn-Koźle at ul. Mostowa 30H. Decision valid for an indefinite term. - Decision by the Marshal of the Opole Province dated 20 December 2012, No. DOŚ.7222.64.2012.HM on change of the manager of the company operating the above installations from Chemzak Sp. z o.o. to GA JRCh Sp. z o.o. - Decision by the State Water Management Agency (PGW Wody Polskie), Head of the Regional Water Management Authority of Gliwice, dated 26 June 2023, Ref. No.: GL.RUZ.4210.36.2023.8.KS/TS, on the issuance of a water-law permit for special use of water, i.e. discharge into the sewerage system of Grupa Azoty Zakłady Azotowe Kędzierzyn of industrial wastewater containing substances particularly harmful to the aquatic environment from installations manufacturing, with the use of chemical processes, organic chemistry products and semi-finished products, i.e. various organic products, waxes and melamine resin, located on the premises of the Kędzierzyn-Koźle plant.</p>							

8.2	Monitor environmental impact of non-hazardous waste landfill sites and prepare a programme of their closure and restoration ('Czajki I II', 'Za Rzeką Białą')	Reduce negative environmental impact	Legislative requirements, best management practices, Bank's PRs	Internal resources and investments	Ongoing	Summary in the annual report for the Bank	
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Information:

Reduce negative environmental impact:

- on air quality:

- maintaining transport roads clean,
- proper organisation of extraction work,
- sprinkling transport roads with water during periods of high temperatures to suppress dust.

- on noise pollution:

- limiting transport vehicle traffic and machine operation at the landfill site to a necessary minimum,
- using only equipment in good working order,
- carrying out extraction activities during daytime only.

- on groundwater:

- maintaining sludge supernatant pumping house in continuous working order,
- maintaining drains, culverts, perimeter trenches, and drainage systems in good condition.

The environmental impact monitoring of the 'Czajki I and II' and 'Za Rzeką Białą' landfill sites is carried out in accordance with the integrated (IPPC) permits.

Remediation of:

- separated section of the Czajki I western cell within the 'Czajki I and II' landfill site - continuation,
- sector AB-2 of the 'Za Rzeką Białą' landfill site - continuation,
- completion, on 31 May 2023, of remediation work on sector AB-3 of the 'Za Rzeką Białą' landfill site.

Requirements:

- Decision by the Governor of the Kraków Province dated 27 April 2007, No. ŚR.XI.AJ.6663-11-06, as amended, granting an integrated (IPPC) permit for the 'Czajki I and II' landfill site. Decision valid for an indefinite term.
- Decision by the Marshal of the Kraków Province dated 19 January 2023, Ref. No. SR-III.7241.24.2022.AG, approving the operation manual for the 'Czajki I and II' landfill site.
- Decision by the Governor of the Kraków Province dated 25 April 2007, No. ŚR.XI.AJ.6663-6-06, as amended, granting an integrated (IPPC) permit for the 'Za Rzeką Białą' landfill site. Decision valid for an indefinite term.
- Decision by the Marshal of the Kraków Province dated 18 May 2022, No. SR-III.7241.7.2022.AG, approving the operation manual for the 'Za Rzeką Białą' landfill site.
- Decision by the Marshal of the Kraków Province dated 18 May 2022, Ref. No. SR-III-7222.19.2021.AG, granting an integrated (IPPC) permit for the following installations - landfill cell sector AB-5 for code 17 06 05* hazardous waste - construction materials containing asbestos, within the 'Za Rzeką Białą' landfill site in Tarnów at ul. Czysta. Decision valid for an indefinite term.
- Decision by the Marshal of the Kraków Province dated 18 May 2022, No. SR-III.7241.7.2022.AG, approving the operation manual for the landfill for asbestos-containing hazardous waste - sector AN-5 within the 'Za Rzeką Białą' landfill site.
- Decision by the Marshal of the Kraków Province dated 18 December 2013, No. SR-IV.1.7322.1.32.2013.MG, granting a water-law permit for discharge of rainwater and meltwater into Rów Chyszowski. Permit effective until 31 December 2023.
- Decision by the Head of the Regional Water Management Authority in Kraków dated 15 July 2019, Ref. No. KR.RUZ.421.1.95.2019.AS, granting a water-law permit for special use of water - discharge of wastewater from the 'Za Rzeką Białą' landfill site (Outlet II) to the Biała river,
- Decision by the Head of the Regional Water Management Authority in Kraków dated 15 July 2019, No. KR.RUZ.421.1.95.2019.AS, granting a water-law permit to discharge groundwater drained from the Klikowa district through a ditch outlet (Outlet II) to the Biała river. Permit valid for a period of 10 years from the date on which the decision became final.

8.3	Monitor environmental impact of the old hazardous waste landfill site and prepare a programme for its restoration ('AN II' landfill)	Reduce negative environmental impact Design document/ (technical and financial) concept for planned restoration with a future monitoring programme	Legislative requirements, best management practices, Bank's PRs	Internal resources and investments	Final closure and implementation of the restoration programme:	Summary in the annual report for the Bank	
<p>Information:</p> <p>The environmental impact monitoring of the 'AN II' landfill site is carried out in accordance with the integrated (IPPC) permit.</p> <p>Requirement:</p> <ul style="list-style-type: none"> - Decision by the Governor of the Kraków Province dated 24 May 2007, No. ŚR.XI.AJ.6663-10-06, as amended, granting an integrated (IPPC) permit for the 'AN II' hazardous waste landfill site. Decision valid for an indefinite term. - Decision by the Marshal of the Kraków Province dated 10 February 2015, No. SR-III-1.7241.21.2014.AG, as amended, approving the operation manual for the 'AN II' landfill site. 							

1. Information about the Company	
Company Name: Grupa Azoty Kopalnie i Zakłady Chemiczne Siarki Siarkopol S.A.	
Company Address: Grzybów 34, 28-200 Staszów, Poland	
Country: Poland	
Town/Location: Staszów, Kielce Province	
Company authorised representative: Andrzej Zieliński I certify that the data contained in this report completely and accurately represents the Company's operations during the reporting period.	
Signature: Wojciech Sagan	
Title: Member of the Management Board	Date: 30 April 2024
Contact Details:	
Telephone: (+48) 158 649 201	
Mobile: (+48) 782 780 608	
email: wojciech.sagan@grupazoty.com	

Please provide key data on the Company performance, as well as production levels at each plant. For each of the 7 large plants please provide:

Item (PLN '000)	Cumulative	
	2022	2023
Revenue	367,752	265,563
Profit/(loss) on sales	14,000	(83,403)
EBIT	16,129	(81,104)
EBITDA	32,122	(59,830)
Net profit/(loss)	20,570	(90,488)

Key performance indicators in terms of energy consumption, emissions, use of natural resources, and carbon dioxide emissions;

Number of staff employed and any change in employment over past 3 years

	As at 31 Dec 2020	As at 31 Dec 2021	As at 31 Dec 2022	As at 31 Dec 2023
Number of direct employees:	802	851	871	812
Number of contracted workers:	-	-	-	-

Provide information on permits and each subsidiary's compliance status with IPPC/IED (*Integrated Pollution Prevention and Control Directive/Industrial Emissions Directive*)

2. General information		
Is the project materially compliant with all relevant EBRD Performance Requirements (taking account of agreed action plans, exemptions or derogations)?	Yes [] No []	If NO, please provide details of any material non-compliances: Not applicable
Is the project materially compliant with all applicable environmental and social laws and regulations?	Yes [] No []	If NO, please provide details of any material non-compliances: Not applicable
Have there been any accidents or incidents that have caused damage to the environment, brought about injuries or fatalities, affected project labour or local communities, affected cultural property, or created liabilities for the Company?	Yes [] No [x]	If YES, please describe, including details of actions to remedy and prevent reoccurrence:
Have there been any changes to environment, social, labour or health and safety laws or regulations that have materially affected the Company?	Yes [] No [X]	If YES, please describe:
How many inspections did you receive from the environmental authorities during the reporting period?	Number: 3	Please provide details of such inspections, including the number and nature of any violations found: 1. Inspection by the Provincial Inspectorate for Environmental Protection (WIOŚ) - carried out on 9 June 2023 - 22 June 2023. Inspection of compliance with the Waste Act of 14 December 2012 with respect to the performance of obligations imposed on waste managers (waste generators, collectors, processors, carriers, brokers, dealers and sellers). Inspection of measures taken to counteract commercial crime. No violations were found and no penalties were imposed. 2. Sulfur Mine inspection carried out by the WIOŚ between 2 December 2022 and 13 January 2023. Inspection of compliance with the conditions regarding the quality and quantity of wastewater introduced into water or into the ground, as specified in relevant water-law permits and integrated (IPPC) permits. No violations were found and no penalties were imposed.

<p>How many inspections did you receive from the health and safety authorities during the reporting period?</p>	<p>Number: 8</p>	<ol style="list-style-type: none"> 1. In 2023, inspectors of the National Sanitary Inspectorate (PIS) carried out 4 inspections following which no decision was issued. 2. In 2023, inspectors of the Regional Mining Authority carried out 2 inspections following which no decision was issued. 3. In 2023, inspectors of the State Mining Authority carried out 2 inspection following which no decision was issued.
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How many inspections did you receive from the labour authorities during the reporting period?

Number:
1

Date: 26 January 2023

Purpose of the inspection: to check compliance with labour law, including OHS regulations; provisions on the lawfulness of employment; employment agency activities, compliance with product requirements or inspection of potential hazards posed by products, driving hours, obligatory breaks and rest time for drivers; records maintained for employees performing work in special conditions or work of a special nature; payment of remuneration in amounts consistent with the minimum hourly wage rate, determined in accordance with the Act of 10 October 2002 on the Minimum Remuneration for Work; compliance with the Act of 10 January 2018 on Restriction of Trading on Sundays, Public Holidays and Certain Other Days; compliance with the Act of 10 June 2016 on Posting of Employees for the Performance of Services; fulfilment of obligations under the Act of 4 October 2018 on Employee Capital Plans (PPK), especially the obligation to enter into PPK agreements and PPK management agreements and to make contributions to PPK.

Outcome: Continue to take measures to prevent behaviours that may amount to workplace bullying.

Communicate the provisions of the Company's Anti-Bullying and Anti-Discrimination Policy to all employees.

Promote sound social interactions in the workplace.

Ensure that employees are given instructions in conformity with the law and provisions of their employment contracts, including the relevant job descriptions.

Provide safe and healthy working conditions for individuals performing work on a basis different than the employment relationship by admitting to work only individuals who have completed health and safety training and who hold a valid medical certificate of fitness to work in the case of which, given the risks involved (including driving a business car), it is necessary for them to demonstrate medical fitness and be familiar with health and safety regulations)

Decisions:

repeal Recommendation No. 1/2023 of the Company's Social Labour Inspector of 18 January 2023.

repeal Recommendation No. 2/2023 of the Company's Social Labour Inspector of 18 January 2023.

repeal Recommendation No. 7/2022 of the Company's Social Labour Inspector of 21 December 2022.

repeal Recommendation No. 4/2023 of the Company's Social Labour Inspector of 8 February 2023.

repeal Recommendation No. 3/2023 of the Company's Social Labour Inspector of 27 January 2023.

Have these visits resulted in any penalties, fines and/or corrective action plans?	Yes [] No [X]	
Has the Company engaged any contractors for project-related work in the reporting period?	Yes [] No [X]	
Were any of the violations stated above the responsibility of contractors?	Yes [] No [X]	If YES, please provide details, including how the Company is ensuring that corrective actions are implemented by the contractor? Not applicable
Have any operations been reduced, temporarily suspended or closed down due to environmental, health, safety or labour reasons?	Yes [] No [X]	If YES, please describe:
<p>Please describe any environment or social programmes, initiatives or sub-projects undertaken during the reporting period to improve the Company's environmental or social performance and/or management systems:</p> <p>Environmental initiative or sub-project:</p> <p>In 2021, Grupa Azoty Siarkopol S.A. obtained a certificate for its Management System compliant with the PN-EN ISO 14001:2015, PN-EN ISO 9001:2015 and PN-ISO 45001:2018 standards. Certificate valid until 8 August 2024.</p> <p>Social initiative:</p> <p>CSR and sponsorship activities are frequently used by businesses as a means of promotion and support for local communities. Promoting the brand, building a positive image and undertaking initiatives directed at the Company's major stakeholders are among key objectives pursued through CSR and sponsorship initiatives. These activities, carried out in a transparent manner and with the aim of delivering tangible promotional and image promotion benefits, help both the sponsor and the sponsored party build value and convey a positive image.</p> <p>Please indicate the level of associated expenditure (capital expenditure and operating expenditure), and whether this relates to the requirements of the Environmental and Social Action Plan, or to any other initiative:</p> <p>In 2023, no funds were allocated to CSR and sponsorship activities.</p>		

3. Status of the Environmental and Social Action Plan
Please provide information on the status of each item in the Environmental and Social Action Plan (ESAP) agreed with EBRD. If the ESAP was updated during the reporting period, please attach a copy of the new plan.
Not applicable

4. Environmental Monitoring Data for each of the key subsidiaries

The information required in this section can be extracted from a CSR report, or a full CSR report can be attached.

Please provide the name and contact details for your environmental manager:			Michał Markiewicz - Head of the OHS and Environmental Protection Centre Telephone No. (+48) 15 864 9420, Mobile (+48) 784 025 659 michal.markiewicz@grupazoty.com	
Parameter²	Amount³	Unit	Compliance Status⁴	Comments⁵
Wastewater				
Chemical Plant				

Total wastewater	79,338	m ³ /year	compliant	
Biochemical Oxygen Demand (BOD5)	420.8	kg/year	compliant	
Chemical Oxygen Demand (COD)	1,777.9	kg/year	compliant	
Suspended solids	1,326.6	kg/year	compliant	
Phosphorus	no data available		monitoring of this parameter is not required	
Nitrates	no data available		monitoring of this parameter is not required	
Heavy metals			monitoring of this parameter is not required	
[Other]				
Air emissions	Per each major point source			
Chemical Plant				
SO ₂	22.58	Mg/year	compliant	
Nitrogen oxides (NO _x)	49.11	Mg/year	compliant	
Particulates	0.27	Mg/year	compliant	
CO ₂	1,385		compliant	
Other parameters			compliant	
CS ₂	0.43	Mg/year	compliant	
Toluene	1.26	Mg/year	compliant	
Mine				
particulates	3.543	Mg/year	compliant	
Other parameters				
H ₂ S	0.0004	Mg/year	compliant	
Noise Equivalent level of sound A over time T	Daytime 42.9±2.3 45.9±2.4 Night time 41.4±2.2 39.8±2.0	dB	Acceptable values in accordance with the permit: daytime: 55 dB night-time: 45 dB	Analysis of noise emission measurements taken at the Chemical Plant in 2021. Measurements taken every two years
[Other]				
Solid waste				
Hazardous solid waste (major types)			Quantity generated consistent with the integrated permits for the Chemical Plant in Dobrów and the sector permit for the Osiek Sulfur Mine	
13 08 99 Wastes not otherwise specified	0	Mg		Recovery method: R9

15 02 02* Absorbents, filter materials (including oil filters not otherwise specified), wiping cloths, protective clothing contaminated by dangerous substances (e.g., PCB)	0.151	Mg		Recovery method: R1
06 13 02* Spent activated carbon	0			Recovery method: R12
16 05 06* Laboratory chemicals consisting of or containing hazardous substances	0.053	Mg		Disposal method: D14
Non-hazardous solid waste (major types)			Quantity generated consistent with the integrated permits for the Chemical Plant in Dobrów and the sector permit for the Osiek Sulfur Mine	
01 05 07 Barite-containing drilling muds and wastes other than those mentioned in 01 05 05 and 01 05 06	413	Mg		Recovery method: D5
15 01 02 Plastic packaging	0	Mg		Recovery method: R12
15 02 03 Plastic packaging	0.725	Mg		Recovery method: R1
16 02 14 Discarded equipment other than that mentioned in 16 02 09 to 16 02 13	1.242	Mg		Recovery method: R12
17 04 02 Aluminium	0	Mg		Recovery method: R4
17 04 05 Iron and steel	31.473	Mg		Recovery method: R4
Please provide details of the types and amounts of solid wastes generated by the project. Indicate where wastes are classified as hazardous. Indicate the final re-use, recycle or disposal method for each waste type.				
Important note: Relates to waste quantities generated in connection with the Plant's operation - not applicable to the project				

5. Resource Usage and Product Output (2023)

Parameter	Amount	Measurement Unit	Comments ⁶
Fuel used - diesel oil	223,102	litre	
Fuel used - motor gasoline	18,463	litre	
Fuel used - propane-butane liquefied gas	6,648	litre	
Crude oil			
Natural gas	7,894.681	MWh	
Hard coal			

Lignite			
Grid electricity	21,272.018	MWh	Joint purchases (Dobrów + Grzybów + Osiek area)
Heat purchased from external sources	571,788.614	MWh	Heat in hot water, supplied from the Połaniec Power Plant
Feedstocks and raw materials used			
Name 1 Petrochemical sulfur	433	Mg	
Name 2 Oil	214	Mg	
Product output		Mg	
Product 1	432,282	Mg	S
Product 2	4,840.465	Mg	SM
Product 3	646	Mg	SN

6. Human Resources management			
Please provide the name and contact details for your Human Resources manager:			
Wiesław Jerzy Aniot Telephone: (+48) 15 86-49-260 wieslaw.aniol@grupaazoty.com	Total	Recruited in this reporting period	Terminated in this reporting period
Number of direct employees:	812	5	64
Number of contracted workers:	-	-	-
Were there any collective redundancies during the reporting period?	Yes [] No [X]	If YES, please describe the redundancy plan, including reasons for redundancies, number of workers involved, how they were selected, consultation undertaken, and measures to mitigate the effects of redundancy:	
Are any redundancies to the workforce planned for the next year?	Yes [] No [X]	If YES, please describe the redundancy plan, including reasons for redundancies, number of workers involved, and selection and consultation process:	
Were there any changes in trade union representation at Company plants during the reporting period?	Yes [X] No []	Decision dated 10 October 2022 to delete the Self-Governing Trade Union of Rail Transport Workers from the National Court Register due to its dissolution.	
Were there any other worker representatives (e.g., in the absence of a trade union)?	Yes [] No [X]	If YES, please provide details and summarise engagement with them during the reporting period:	
Were there any changes in the status of Collective Agreements?	Yes [X] No [X]		
Have employees raised any grievances with the project during the reporting period?	Yes [] No [X]	If YES, please state how many, split by gender, summarise the issues raised in grievances by male and female staff and explain how the Company has addressed them:	
Have employees raised any complaints about harassment or bullying during the reporting period?	Yes [] No [X]	If YES, please state how many, split by gender, summarise the issues raised by male and female staff and explain how the Company has addressed them:	
Have there been any strikes or other collective disputes related to labour and working conditions at the Company in the reporting period?	Yes [] No [X]	If YES, please summarise nature of, and reasons for, the disputes and explain how they were resolved:	

<p>Have there been any court cases related to labour issues during the reporting period?</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>If YES, please summarise the issues contested and outcome: 1. Action brought against the Company by Stawomir B. for an increase in pension. Case settled amicably before a mediator, with the settlement subsequently sanctioned by the Regional Court of Kielce.</p>
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<p>Have there been any changes to the following policies or terms and conditions during the reporting period in any of the following areas:</p> <ul style="list-style-type: none"> - Trade union recognition - Collective Agreements - Non-discrimination and equal opportunities for all - Equal pay for equal work - Gender equality - Bullying and harassment, including sexual harassment - Employment of young workers under 18 - Wages and salaries (for regular and overtime hours) - Overtime - Working hours - Flexible working / work-life balance - Grievance mechanism for workers - Health & safety 	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>	<p>If YES, please give details, including of any new initiatives: Amendments relating to the Collective Bargaining Agreement for Employees of Grupa Azoty Kopalnie i Zakłady Chemiczne Siarki Siarkopol S.A. of Grzybów:</p>
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7. Occupational Health and Safety Data					
Please provide the name and contact details for your Health and Safety manager:		Michał Markiewicz - Head of the OHS and Environmental Protection Centre Telephone No. (+48) 15 864 9420, Mobile (+48) 784 025 659 michal.markiewicz@grupaazoty.com			
	Direct employees	Contracted workers		Direct employees	Contracted workers
Number of man-hours worked in this reporting period:	1,365.0 thousand		Number of fatalities ⁷ :	0	
Budget spent on OHS in this period (total amount and currency):	PLN 2,086,504		Number of disabling injuries:	0	
OHS training provided in this period in person-days:	65 training sessions		Number of Lost Time Incidents (including vehicular):	0	
Number of lost workdays resulting from incidents:	672		Number of cases of occupational disease:	0	
Number of sick days:					
Accident causes (falling from height) - adverse weather (slippery road and pavement surfaces, temperature below freezing, high air humidity), - not paying sufficient attention while moving about, - forced body position,					
Please provide details of any fatalities or major accidents that have not previously been reported to EBRD, including total compensation paid due to occupational injury or illness (amount and currency): None					
Please summarise any emergency prevention and response training that has been provided for Company personnel during the reporting period: None was provided.					
Please summarise any emergency response exercises or drills that have been carried out during the reporting period: Mining rescuers designated by the employer are drilled every two months to ensure they are prepared to respond to an emergency (fire, explosion, hot substance spill). The chemical rescue team of the Chemical Plant were drilled once a quarter to improve their ability to respond to an emergency (fire, explosion, hazardous substance leakage/spill). All chemical rescuers also underwent test drills at the Grupa Azoty Rescue Education Centre. Moreover, every year State Fire Service officers perform inspection and examination activities at all of the Company's plants.					

8. Stakeholder Engagement	
Please provide the name and contact details for your external relations or community engagement manager:	Not applicable

Please provide information on the implementation of the Stakeholder Engagement Plan agreed with EBRD and summarise interaction with stakeholders during the reporting period, including:

- meetings or other initiatives to engage with members of the public or public organisations during the reporting period
- information on environmental protection, social policy and safety matters provided to the local community and other stakeholders during the reporting period:
- coverage in the media:
- interaction with any environmental or other community groups.

Please describe any changes to the Stakeholder Engagement Plan (SEP) agreed with EBRD:

Grupa Azoty Siarkopol S.A. has no Stakeholder Engagement Plan.

How many complaints or grievances did the project receive from members of the public or civil society organisations during the reporting period? Please split by stakeholder group. Summarise any issues raised in the complaints or grievances and explain how they were resolved:

There were no such issues.

9. Community Development

Please summarise any social or community development / investment initiatives undertaken by the Company during the reporting period, and any associated expenditure:

As the Company had no approved CSR and Sponsorship Plan in place, all donation and sponsoring requests it received in 2023 were left without reply. There were a total of 74 donation requests and 10 sponsoring requests.

ENVIRONMENTAL AND SOCIAL ACTION PLAN

Table 0.1 Wista Project, Grupa Azoty Poland - Environmental, Social, Health and Safety (ESHS) matters, Updated (Alchemist Project) Action Plan:

GRUPA AZOTY KOPALNIE I ZAKŁADY CHEMICZNE SIARKI SIARKOPOL S.A.

6. Actions required to maintain compliance with EHS requirements of national law and EU environmental standards - GRUPA AZOTY KOPALNIE I ZAKŁADY CHEMICZNE SIARKI SIARKOPOL S.A.							
No.	Action	Environmental risks, liabilities/benefits	Legislative requirements/ Best practice	Requirement/ Resources	Scheduled completion - action to be completed by end of year	Target and evaluation criteria for implementation progress	Comments
9.1	Monitoring of environmental impact with respect to gas and particulates emissions into the air and quality of discharged effluents, as well as assessment of the condition of surface water in the area covered by facilities for which an Integrated Pollution Prevention and Control (IPPC) permit is required.	Reduce negative environmental impact in line with IED	Legislative requirements, best management practices, Bank's PRs	Internal and external	Ongoing/ad-hoc and periodic reports	Summary in the annual report for the Bank	
<p>Information</p> <p>In 2023, the Chemical Plant in Dobrów continued to implement integrated environmental protection measures, taking into account applicable legal requirements, environmental protection standards and safety.</p> <p>Legal requirements: The Chemical Plant's facilities operate on the basis of the following integrated (IPPC) permit and notification:</p> <ol style="list-style-type: none"> 1. Decision of the Marshal of the Kielce Province Ref. No. OWŚ-VII.7222.5.2017 of 31 August 2017, as amended by Decision Ref. No. OWŚ-VII.7222.26.2019 of 23 December 2019, granting an integrated (IPPC) permit for facilities producing sulfur insoluble in carbon disulfide, located at the Chemical Plant in Dobrów, rural district of Tuczepy. 2. Notification of a sulfur mill with a capacity of up to 2 Mg/h, emissions from which do not require a permit but must be notified. Card number 000080/2017. 							

Soil, ground and groundwater protection at the Chemical Plant is achieved by:

- tight sealing of processes. Processes at the Chemical Plant are conducted in sealed devices made of materials suitable for the type of process media used,
- use of systems in which tanks may be drained by pumps (in case of emergency), with their content directed to the network or another tank,
- ensuring good technical condition of underground infrastructure to prevent leakage from interceptors,
- application of impermeable materials (equipment and devices are placed on a concrete surface, with any leakage drained to the industrial wastewater system),
- use of devices to measure and monitor the level of liquids in tanks, connected to a lock-out system,
- identification of wastewater and its analysis in terms of quality and volume,
- minimum amount of water used in the process (stripping and returning water back to protective cushions),
- cooling with water from the closed-loop cooling water system,
- maintaining good condition of surface water intake points and other equipment used to supply water to the plant for process and other purposes,
- rational waste management system,
- appropriate procedures for all operations associated with the handling and transport of liquids,
- regular inspections of the technical condition of plant and equipment.

Environmental parameters are monitored in accordance with the requirements set out in integrated (IPPC) permits:

- monitoring of pollutant emission levels. Measurement of concentrations and emissions of sulfur dioxide (SO₂), carbon disulfide (CS₂) and toluene from the plant's emission source (twice a year) and of SO₂, NO₂ and particulates content in flue gas emissions from the plant's CCGT unit (at least once a year) by an accredited laboratory.
- monitoring of the amount and quality of surface water drawn from the Czarna Staszowska river,
- surface water quality tests performed in the section starting in Oględów, in ducts located above and below the channel outlet, in terms of parameters specified in the applicable decision; frequency: once every two months,
- industrial wastewater quality tests performed at the interceptor outlet to the open channel, in terms of pollution parameters specified in the applicable decision; frequency: once every two months,
- regular measurements of noise generated by the plant during day- and night-time, so as to determine and analyse the impact of noise on the environment in the immediately surrounding area protected from noise pollution,
- monitoring and recording of waste, in accordance with law.

Safety:

The Chemical Plant has a Safety Report, approved by the Commander-in-Chief of the State Fire Service in the Kielce Province by Decision Ref. No. WZ-5586.1.16.2015, of 26 October 2015 and Decision Ref. No. WZ.5586.6.1.2019 of the Kielce Province Commander-in-Chief of the State Fire Service, dated 21 August 2019, approving amendments to the Dobrów Chemical Plant Safety Report.

Under the Decision, the Plant's operator is ready to roll out a programme to prevent and manage industrial accidents, in accordance with the Internal Emergency Plan.

9.2	Monitor environmental impacts of mining operations, restoration of mining sites, and reclamation of post-mining land for use, in accordance with applicable legal decisions and public needs.	Reduce negative environmental impacts in accordance with IED, and implement measures expected by the local community.	Legislative requirements, best management practices, Bank's PRs	Internal and external	Ongoing/ad-hoc and periodic reports	Summary in the annual report for the Bank	
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Information:

In 2023, the Osiek Sulfur Mine continued to implement integrated environmental protection measures, taking into account applicable legal requirements, environmental protection standards, safety, and the local community's needs. The monitoring of environmental impacts of the Osiek Sulfur Mine covers: surface protection, restoration of post-mining sites, waste management, water and wastewater management, protection of surface water and groundwater, and air pollution control.

Measures taken to eliminate negative environmental impacts of mining activities on the ground's surface include: safety pillars and designation of mining protection areas, eruption prevention measures, and measurements of ground subsidence.

Restoration of post-mining sites

Given the terrain in the Osiek deposit area, which includes a low and high terrace, and the earlier ground subsidence, restoration models other than agriculture, afforestation and tree planting need to be determined. This applies in particular to the Vistula valley forming the lower terrace. The 'Legal and environmental study for the restoration of the Osiek mining sites', prepared in 2011 at our request by the Stanisław Staszic Scientific Association of Kraków (*Stowarzyszenie Naukowe im. Stanisława Staszica w Krakowie*), proposes an afforestation/tree planting/water restoration model for the lower terrace, with an option of creating natural water reservoirs in areas with a considerable degree of subsidence. This will be possible after full discontinuation of mining work in the high terrace. The mine currently holds the following decisions determining the possible land restoration models:

- Decision No. G.II-6012/3/96 of 5 July 1996, determining the afforestation model for restoration of 16.30 hectares of land in the area of former A-1 and A-2 control rooms.
- Decision No. G.III-6019/8/2003 of 26 August 2003, determining the afforestation model for restoration of 28.9668 hectares of land situated in Mikołajów and in Osiek - cadastral district No. 2 (formerly Osieczko), and the agricultural model for reclamation of 1.2210 hectares of land.
- Decision No. OŚ.II-6019/4/2010 of 26 April 2010 and amending decision No. GP.6122.3.2022 dated 31 March 2022 determining the afforestation model for restoration of 24.23 hectares of land situated in Mikołajów and 10.3996 hectares in Osiek - cadastral district No. 2, and the tree planting model for restoration of land located in Mikołajów (85.31 hectares), in Osiek - cadastral district No. 2 (formerly Osieczko - 35.6894 hectares), and in the town of Osiek (1.46 hectares).
- Decision No. OŚ.6122.8.2011.III.D of 5 August 2011, determining the tree planting model for restoration of 10.7138 hectares of land situated in Mikołajów.

- Decision No. OŚ.6122.6.2011.III.D of 5 August 2011, determining the agricultural model for reclamation of 7.91 hectares of land situated in Trzcianka.
- Decision No. OŚ.6122.8.2011.III.D of the Staszów County Head of 21 March 2012, concerning correction of a calculation error in Decision No. OŚ.6122.8.2011.III.D of 5 August 2011.
- Decision No. OŚ.6122.7.2013.III.D of the Staszów County Head of 26 August 2013, determining the tree planting model for restoration of plot No. 961 with an area of 0.0576 hectares, situated in cadastral district No. 2 in Osiek.
- Decision No. OŚ.6122.4.2014.III.D of the Staszów County Council of 12 March 2014, determining the tree planting model for restoration of plot No. 1087 with an area of 0.4798 hectare, situated in cadastral district No. 2 in Osiek.

- Decision No. OŚ.6122.11.2014.III.D of the Staszów County Council of 6 August 2014, determining the tree planting model for restoration of a part of plot No. 731/2 with an area of 0.3677 hectare, situated in cadastral district No. 2 in Osiek.
- Decision No. OŚ-IV4.6122.5.2017 of the Staszów County Council of 19 May 2017, determining the afforestation model for restoration of 3.3426 hectares of land situated in Mikołajów.
- Decision No. OŚ-IV4.6122.11.2017 of the Staszów County Council of 23 November 2017, determining the afforestation model for restoration of 23.3248 hectares of land situated in Pliskowola and the agricultural model for reclamation of 24.3977 hectares of land situated in Pliskowola and 0.4300 hectare of land situated in Trzcianka.
- Decision No. OŚ-IV4.6122.8.2020 of the Staszów County Head of 28 December 2020, determining the afforestation model for restoration of 4.7250 hectares of land situated in Mikołajów and the agricultural model for restoration of 1.0900 hectares of land situated in Mikołajów.

Under the above decisions, a part of plot No. 1438 with an area of 8.0580 hectares situated in cadastral district No. 2 in Osiek (the area of former A-1 and A-2 control rooms) was restored; Decision No. OŚ.6122.8.2013.III.D of 6 September 2013 regarding completion of the restoration process was obtained from the Staszów County Head; agricultural reclamation of 7.1318 hectares of land situated in Trzcianka was performed; and Decision No. OŚ.6122.13.2013.III.D of 9 January 2014 regarding completion of the restoration process was obtained.

Under Decision No. OŚ.II.6019/4/2010 determining the restoration model, and Decision No. OŚ.6237.1.2011.IIIB approving the closure of the waste drilling mud landfill site located in Mikołajów, restoration of the site was performed based on the relevant technical documentation. By Decision No. OŚ.6122.14.2014.III.D of 7 November 2014, the Staszów County Head determined that restoration of the waste drilling mud landfill site had been completed. The landfill site is currently in the after-care phase and is subject to monitoring in accordance with the Landfill Regulation of the Minister of Environment (Dz.U.2013.523) in terms of the ground subsidence area as well as the level and quality of groundwater.

Under Decisions No. G.III-6019/8/2003 and OŚ.II.6019/4/2010 on land restoration models, restoration was performed on land located in Osiek (cadastral district No. 2) and Mikołajów, with a total area of 8.5055 hectares, including:

- Region No. 2 with an area of 2.9015 hectares, located in the area of the former A-5 control room (restoration by afforestation),
- Region No. 3 with an area of 5.6040 hectares located east of the A-7R control room, between the pre-main route No. 3 and pre-main pipeline No. R-IV, (restoration by afforestation of 5.3473 hectares and restoration by tree planting of 0.2567 hectare);

and Decision No. OŚ.6122.15.2016.III.D of 16 December 2016 was obtained from the Staszów County Head determining that the land restoration process had been completed.

Under the decisions on restoration models, i.e., OŚ.II-6019/4/2010 and OŚ.6122.8.2011.III.D, the land restoration process was carried out within Region No. 4, located in Mikołajów and Osiek (district No. 02), with a total area of 21.7444 hectares; whereupon the Staszów County Head's Decision No. OŚ.6122.17.2016.III.D of 19 May 2017 and the Staszów County Head's Ruling No. OŚ.IV4.6122.10.2017 of 20 July 2017 were obtained determining that the land restoration process had been completed.

On the basis of Decision No. OŚ. II-6019/4/2010 of the Staszów County Head of 26 April 2010, the restoration of 3.60 hectares of land located in Mikołajów (Region No. 6) commenced in 2020 (restoration by tree planting). In 2020, the technical phase of the restoration work was carried out. In 2021, the biological phase commenced, involving soil fertilisation treatments and improvement of the physico-chemical properties of the land. In the summer of 2022, grassland treatments were carried out (mowing, green waste shredding, and supplemental fertilization). In autumn, activities were initiated to prepare the land for its natural end use, which involved planting of trees and shrubs.

Rational waste management

Management of waste, including mining waste from the Osiek Sulfur Mine, is in line with the applicable laws and administrative decisions issued by the Marshal of the Kielce Province:

- Waste generation permit covering waste generated by the Sulfur Mine, dated 31 December 2014, Ref. No. OWŚ-VII.7221.2.44.2014, as amended by Decisions OWŚ-VII.7221.2.23.2015 of 13 August 2015 and OWŚ-VII.7221.2.7.2017 of 8 June 2017.
- Mining waste management programme, Decision No. OWŚ-VI.7240.1.1.2017 of 27 March 2017.
- Permit No. OWŚ-VI.7240.6.1.2017 of 3 August 2017 to operate a mining waste disposal facility.

In compliance with the requirements of the Act on Mining Waste, Grupa Azoty Siarkopol reviewed its mining waste management programme. The adopted waste management, handling and storage methods have no adverse environmental impacts. The prescribed period for the storage of waste before its disposal is complied with. The waste records are maintained in the Waste Database (BDO) electronic system.

Annual results of the observations and their interpretation, together with attached maps, form the basis for a report on the impacts of mining activities on the rock mass and mining sites, drawn up by 31 March of the following year. If any impacts of mining activities on the quality of groundwater are identified, appropriate measures are taken to eliminate them. Such measures may include changes in the direction of extraction or use of protective barriers.

Surface water protection

Protection of surface water in the area of the Osiek Sulfur Mine is based on:

- introduction of a closed-loop system for formation waters,
- eruption-free extraction of sulfur,
- introduction of a closed-loop system for sanitary and industrial wastewater,
- moving of watercourses and ditches outside the mining sites and changing their functions,
- regular testing of water quality in ditches and watercourses within the area of the mine.

Following the introduction of a closed-loop system for formation waters, the mine does not discharge any wastewater to the environment.

The quality parameters of surface waters are monitored once a month. The monitoring covers the following surface waters: the Wisła river and Osiek Lake, the watercourse from Pliskowola, the watercourse from Mikołajów, and the watercourse from Mucharzew and the Strzegomka river.

Protection of groundwater

Groundwater is protected based on a system of observations conducted in accordance with the 'Instruction for hydrogeological observations regarding the method, scope and frequency of observations, measurements and tests as well as their recording', approved by the Mine Operation Manager.

Air pollution control

Air pollution control in the area of the Osiek Sulfur Mine is based on:

- tight sealing of the decompression system and chemisorption installation for on-site sulfur tanks,
- ongoing drainage of the area to prevent formation of pools which would emit hydrogen sulfide,
- regular monitoring of H₂S ambient concentrations.

Measurements of H₂S ambient concentrations in the area of the Osiek Sulfur Mine are performed at five points in Osiek, Osieczek, Pliskowola, Trzcianka and Lipnik. Since 2013, measurements of hydrogen sulfide ambient concentrations have been averaged for one-hour periods, in line with the regulations currently in effect.

In the Decision of 8 March 2013 Ref. No. OWS VII.7221.1.12013, the Marshal of the Kielce Province repealed the earlier Decision of the Governor of the Tarnobrzeg Province of 12 March 1993 Ref. No. OŚ-II-B-7644/7/93, as amended on 10 March 1997 (Ref. No. OŚ-II-7644/4/97/JM), as well the Decision of the Governor of the Kielce Province of 23 October 2003 Ref. No. ŚR.II.6610/1-3/03, imposing on Kopalnie i Zakłady Chemiczne Siarki Siarkopol S.A. of Grzybów an obligation to monitor air pollution within the site's impact area.

Environmental standards and needs of local communities

Having regard to Art. 144 of the Environmental Protection Law and the provisions of Sections 165 and 166 of the Regulation of the Minister of Economy dated 25 April 2014 on specific requirements for the operation of mining facilities producing minerals through wells (Dz.U.2014.812), the Osiek Sulfur Mine continues to monitor the ambient concentrations of hydrogen sulfide in Osiek, Osieczko, Pliskowola, Trzcianka and Lipnik, regardless of the decision issued by the Marshal of the Kielce Province abolishing the obligation to conduct air pollution monitoring in the area of the mine.

The monitoring has been conducted since 1994, having provided extensive amounts of comparative data, which has proved very useful in resolving disputes with local authorities and residents.