

ZMIENIAMY SIĘ
DLA WAS

ESG STRATEGY 2023-2027



ZEPAK
Energia dla Ciebie



RAZEM TWORZYMY LEPSZĄ PRZYSZŁOŚĆ

Jesteśmy członkiem:

 **PROGRAM / CZYSTA / POLSKA**



Being aware of its impact on the environment, ZE PAK Group wants to set standards and responsibly manage its entire value chain. For the first time, the Group developed the Social Responsibility Strategy for 2017-2020, which set key lines of action and goals (KPIs) focused on the one hand on optimizing efficiency and continuous improvement of results in the environmental and social dimension, as well as on ensuring compliance in areas of significant impact on the environment. Nevertheless, the key areas defined at that time, although still valid, were supplemented with new aspects of social responsibility related to the transformation of the Group and the transformation of its business model into a sustainable one.

The sustainable development strategy of ZE PAK Group takes into account ESG factors, i.e. regarding the impact on the environmental, social and governance issues, and focuses on:

- decarbonisation of the business model and its transformation towards a sustainable economy, in line with the energy transformation of the Eastern Wielkopolska region,
- in ESG areas, not directly related to transformation, on activities consistent with the logic of striving to improve existing processes, typical of Total Quality Management (TQM) and ensuring at least compliance with legal requirements and expectations of the environment.



Our mission



The mission of ZE PAK SA **Pątnów – Adamów - Konin SA**

is to produce environmentally clean electricity and heat in an efficient and safe way.

The Company's strategy **is oriented towards development and modernity founded**

is oriented towards development and modernity founded on state-of-the-art technology, innovative organizational solutions, and a highly specialized staff of engineers and technicians.



Business model transformation

ZE PAK has been an important link in the National Energy System for decades. It is also important for the industrial functioning of Konin subregion and on the local labor market.

ZE PAK SA joined the energy transformation of Eastern Wielkopolska without hesitation, an Agreement for a Just Energy Transition of Eastern Wielkopolska was signed in Konin, the participants of which were representatives of the Management Board of Wielkopolskie Voivodeship, the Management Board of ZE PAK SA, the city of Konin and communes cooperating with ZE PAK Capital Group.

The purpose of the agreement was to find opportunities for the development of energy from renewable energy sources, transition to a low or zero-emission economy, which is an alternative to coal.

Continuous improvement

At the level of operational management, ZE PAK Group focuses primarily **on ensuring ongoing security for the natural and social environment**, while ensuring continuity and stability of production.

The companies of ZE PAK SA Group, against the backdrop of the local and rather small labor market, are perceived **as a stable and trustworthy employer**.

With the aim of minimizing the impact of the energy sector on the environment, the Group strives to **improve the circular economy**, e.g. through the use of waste heat accompanying the production of electricity to heat the city of Konin, the use of by-products of flue gas desulphurisation (gypsum) for the production of gypsum products or plasterboards and the use of furnace waste to produce a mix for road bases and binders.

Main ESG 2023-2027 strategy goals



Environment



Social



Governance



E - environment

Goal 1: Transformation towards zero and low-emission energy

Goal 2: Entering the hydrogen fuel and zero-emission automotive industry

Goal 3: Responsible exit from the mining industry (lignite) and conventional lignite-based production, respecting the social and natural environment

Goal 4: Being a good neighbor and a member of the local community: reducing the impact of current operations on the social and natural environment

Goal 5: Striving for a circular economy (CE)



S - social

Goal 6: Being a responsible employer in the region



G - governance

Goal 7: Ensuring a high-quality management system and its continuous improvement, taking into account social and environmental aspects in the decision-making process.

Business model transformation

Continuous improvement

Goal 1: Zero and low carbon energy transition (steps)

- **Abandonment of lignite mining** - shutdown and decommissioning of coal-fired units in Pątnów Power Plant.
- **Investments in the production of electricity from the sun** - purchase of photovoltaic projects ready for implementation and construction of photovoltaic farms on reclaimed areas owned by ZE PAK SA Group.
- **Investments in the production of electricity from wind** - purchase of ready-to-implement wind projects and construction of wind farms on reclaimed areas owned by ZE PAK SA Group.
- **Investments in nuclear energy** - establishing cooperation with the Korean company KHNP in order to assess the potential possibility of using the infrastructure and assets of Pątnów Power Plant for the development of a nuclear energy project.
- **Investments in the production of electricity from offshore wind farms** - establishing cooperation with the world leader in the field of offshore wind farms - Ørsted, and joint efforts to build offshore wind farms.
- **Investments in the production of electricity from biomass** - adaptation of coal boilers to biomass combustion in Konin Power Plant.
- **Production of electricity based on a low-emission energy source, which is a gas and steam unit under construction** on the site of the former Adamów coal power plant, implemented by PAK CCGT.



Goal 1: Zero and Low Carbon Energy Transition (KPIs)

Meter definition	2023	2024	2025	2026	2027
% share of electricity generated from lignite	73%	77%	0%	0%	0%
amount of direct CO2 emissions from energy production per unit of production (1 MWh)*	1.07	0.88	-	-	-
amount of direct CO2 emissions from electricity production*	1 976	1 356	-	-	-
installed capacity of low- and zero-emission assets (MW) (wind farms + photovoltaics + biomass)	209.5	332.5	390.9	713.5	713.5
installed capacity of zero-emission assets (MW) (wind farms + photovoltaics)	109.5	232.5	290.9	613.5	613.5
installed capacity of low-emission assets (MW) (biomass)	100.0	100.0	100.0	100.0	100.0

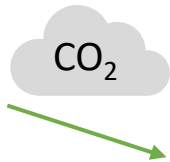
*excluding energy from biomass



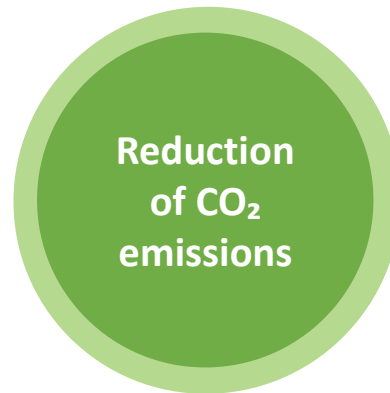
OBJECTIVES AND ASSUMPTIONS: Transition to a low or zero-emission economy



Energy transformation from coal to RES - from black to green energy



CO₂ emissions from electricity production reduced over the last 5 years - 57.5% decrease compared to 2016



Building the first in Europe, nationwide, **full value chain of the green hydrogen economy** - an investment in the future, reduction of CO₂ emissions, clean air and zero-emission fuel of the future.

Decommissioning of coal production by the end of 2024 – The scenario assumed the operation of coal-fired units 1, 2 and 5 in Pątnów Power Plant until 2024, while the 474 MW unit (former Pątnów II Power Plant) was to operate no longer than until 2030. Currently, the baseline scenario for the operation of all the Group's coal-fired units until the end of 2024, i.e. until these assets are eligible for support in the form of the capacity market mechanism, has been adopted.

Indicators - the level of CO₂ and other harmful emissions substances in the ranges 1,2 and 3 - when used GHG Protocol methodology

* In recent years, devices with a capacity of 1293 MW have been switched off in ZE PAK SA Capital Group. In the largest power plant in the Group - Pątnów, only 4 coal-fired units are left from the originally available 7 units



GOALS	IMPLEMENTATION	TIME HORIZON
<ul style="list-style-type: none"> • production of electricity from the sun - purchase of ready-to-implement photovoltaic projects and construction of photovoltaic farms on reclaimed land owned by ZE PAK SA Group. 	<p>The first largest photovoltaic farm in Poland with a capacity of 70 MWp was built in Brudzew commune and has been producing electricity since October 2021.</p>	<p>October 2021</p>
<ul style="list-style-type: none"> • production of electricity from wind - purchase of ready-to-implement wind projects and construction of wind farms on reclaimed areas owned by ZE PAK SA Group 	<p>The first ready-made wind farms will be commissioned in the third quarter of 2023</p>	<p>Q3 2023</p>
<ul style="list-style-type: none"> • production of electricity from offshore wind farms - establishing cooperation with Ørsted, a world leader in the field of offshore wind farms, and joint efforts to build offshore wind farms 		
<ul style="list-style-type: none"> • prospective projects related to nuclear energy - establishing cooperation with an external partner, the state-owned Korean company Korea Hydro & Nuclear Power Co., Ltd., in order to assess the potential possibility of using the infrastructure and assets of Pątnów Power Plant for the development of a nuclear energy project 	<p>In April 2023, ZE PAK SA and PGE SA established a joint special purpose vehicle, PGE PAK Energia Jądrowa SA with its registered office in Konin, in order to start direct cooperation on the construction of a nuclear power plant based on the Korean APR1400 technology. The purpose and task of this company will be participation in the planned implementation of the construction of a nuclear power plant in Konin in Pątnów Power Plant.</p>	<p>The launch of the first unit of the power plant is possible as early as 2035.</p>



Goal 2: Entering the hydrogen fuel and zero-emission automotive industry (steps)

- **Production of green hydrogen** - an important area of operation of Konin Power Plant will be the production of green hydrogen, which will be produced in the process of electrolysis of water using energy from a renewable source - biomass and solar energy, whose transformation into electricity, in dedicated installations, will power the electrolysis system.
- **Hydrogen refueling stations** - construction of hydrogen refueling stations and providing them with mobile hydrogen locomotives.
- **Production of zero-emission buses** - development of the concept and implementation of the project for the production of an innovative city hydrogen bus. Construction of a production plant for buses powered by hydrogen cells, together with an office building and accompanying infrastructure.



Goal 2: Entering the hydrogen fuel and zero-emission automotive industry (KPIs)



Meter definition	2023	2024	2025	2026	2027
hydrogen production volume [tons]	211	480	960	1 920	3 120
number of hydrogen buses produced	33	58	60	80	100



GOALS	IMPLEMENTATION	TIME HORIZON
<ul style="list-style-type: none"> • production of electricity from biomass and production of green hydrogen - e.g. adaptation of coal-fired boilers for biomass combustion in Konin Power Plant. An important area of activity of Konin Power Plant is to be the production of green hydrogen in the electrolysis process 	<p>In Konin Power Plant, two coal-fired units have been adapted to burn biomass. The construction of the hydrogen plant is at the implementation stage.</p>	<p>April 2022 – commissioning of the second biomass unit at Konin Power Plant</p> <p>H1 2023 - planned completion of the construction of the hydrogen plant</p>
<ul style="list-style-type: none"> • production of zero-emission buses - development of the concept and implementation of the project for the production of innovative hydrogen city bus 	<p>The first NesoBus hydrogen bus has already been produced and received EU approval. NesoBus was tested with passengers in many cities on bus routes by municipal transport companies.</p> <p>The construction of a hydrogen bus factory is underway.</p> <p>The first public tender for the construction and delivery of 20 hydrogen-powered electric buses has been won.</p>	<p>May 2022 - presentation of the hydrogen bus</p> <p>H2 2023 - planned date of completion of the factory construction</p> <p>March 2023 - signing a contract for the construction and delivery of 20 hydrogen buses with a completion date of up to 240 days from the date of signing the contract</p>



Goal 3: Responsible exit from the mining industry (lignite) with respect for the social and natural environment (steps)

- **End of lignite mining** in own mines.
- **Completion of the reclamation of post-mining areas** - carrying out demolition and reclamation works in the areas covered by mining and restoring the post-mining areas to use depending on the nature of the reclamation (e.g. water, agricultural, forestry).
- **Restoration of natural water relations**, disturbed by years of exploitation, by filling water reservoirs created in post-mining areas in the water-direction reclamation process, filling and disappearing depression craters, while stabilizing flows in watercourses in the transitional period until natural balance is restored.
- **Industrial investments in the region** - implementation of investments in generation assets in the region, which will partly compensate for the gap in tax revenues of the communes where ZE PAK plants operate.
- **Providing heat for the city of Konin** by using waste heat that accompanies the production of electricity from biomass.
- **Providing hot water from cooling the power plant**, which has a very positive effect on the ecosystems of the nearby lakes and is particularly valuable for fish farms. **Supplying fishing farms** with waste heat from power plant cooling, constituting its economic use (CE), enables continuity and stable production for fishing enterprises in the region.



Goal 3: Responsible exit from the mining industry (lignite) with respect for the social and natural environment (KPIs)



Meter definition	2023	2024	2025	2026	2027
lignite extraction (in thousand tons)	1 200	2 300	-	-	-
reclaimed area (in ha)	856	514	540	95	748



Goal 4: Being a responsible employer in the region (steps) (1/2)

- **Development of employees in the lignite mining and electricity generation area** - offering employees previously employed in the generation area who have not yet obtained retirement rights or the so-called mining leave, assistance in finding a job in ZEPAK Group or Polsat Group companies or outside them, in enterprises in the region, including professional retraining.
- **A decent level of remuneration** - maintaining the average remuneration at an attractive level compared to the average in the communes where ZE PAK SA Group conducts its operations.
- **Dialogue with the social side** - dialogue between the company's authorities and trade union representatives to discuss current problems and long-term challenges. Reducing the risk of escalating disputes.
- **Development and training** - ensuring an effective system of professional training, both in terms of mandatory and optional training, expanding the competences of employees.



Goal 4: Being a responsible employer in the region (steps) (2/2)

- **Effective health and safety training** - regular training of employees on health and safety rules, with particular emphasis on practical aspects relating to the risks associated with the performance of work at specific jobs in ZE PAK SA Group. Building awareness of threats, the need to avoid routine, recklessness or not using individual protection measures.
- **Safety analysis** - recording and analyzing accidents and potential accident.
- **Collective and individual protection equipment** - guaranteeing the budget for the purchase of necessary individual and collective protection equipment that ensures the highest level of protection.
- **First aid and qualified pre-medical rescue workers** - providing regular training to refresh and constantly improve the competences of employees who support professional rescuers and are able to provide first aid before the arrival of professional rescuers in the event of an accident (equipping them with marked helmets, means of communication and measures necessary to provide first aid).



Goal 4: Being a responsible employer in the region (KPIs)



Meter definition	2023	2024	2025	2026	2027
employment level (in persons)	2 800	2 600	1 450	1 200	1 020
average salary in ZE PAK SA Group / average salary announced by the Central Statistical Office for Konin subregion	≥100%	≥100%	≥100%	≥100%	≥100%
number of work days lost due to strike actions	0	0	0	0	0
accident frequency rate	<100% values from the previous year	<100% values from the previous year	<100% values from the previous year	<100% values from the previous year	<100% values from the previous year



As of today:



Risk related to employees is an occupational risk in terms of occupational health and safety. It is strongly dependent on the risks associated with the nuisance of work at a specific workplace, and all activities in the area of OHS management are focused on eliminating or reducing risks and minimizing the effects of accidents, if they occur, based on the occupational risk assessment.

GOALS:

- ✓ elimination and reduction of hazards and accidents at work
- ✓ high level of employee involvement in OHS activities
- ✓ increasing level of employee satisfaction

INDICATORS: accidents at work

Number of people exposed to harmful factors

ZE PAK activities in the area of safe working conditions:

- we conduct on-the-job training,
- we monitor landslides on open pits,
- we monitor underground and surface waters in the areas within the impact of open pits,
- we illuminate communication routes on the technical back-up site,
- we take care of hygiene by washing our hands frequently, we minimize internal and external meetings in which a large group of people are expected to participate, and we organize meetings using means of remote communication, i.e. teleconferences, videoconferences,

- we have developed a procedure to be followed in the event of suspected SARS-CoV-2 infection at the workplace,
- we identify hazards, conduct occupational risk assessments, provide protective vaccinations for employees exposed to biological agents,
- we conduct measurements of harmful factors in the working environment,
- we prepare Last Minute Risk Analysis,
- we conduct health and safety inspections,
- we perform post-accident analyses.

Goal 5: Striving for a circular economy (CE) (steps)

- **Optimal management of flue gas desulphurization by-products (gypsum)** - use of the raw material by companies outside ZE PAK Group, i.e. in mushroom farming, for the production of gypsum products, plasterboards and by cement plants.
- **Optimal management of furnace waste** - use of the raw material by companies outside ZE PAK Group, i.e. for the production of mixes for road foundations and road binders.
- **Waste heat management** - economic use of waste heat, which is a by-product of energy production (e.g. for heating purposes, water heating in fish farms and their fish hatcheries, possibly agriculture) (see Objective 3)
- **Recovery of raw materials from the demolition of industrial facilities** - striving to recover all valuable raw materials from mining and manufacturing infrastructure facilities that are extinguished and intended for liquidation (e.g. ferrous and non-ferrous metal scrap, concrete rubble).
- **Responsible procedures with other waste** - proper management of waste that is currently unsuitable for reuse in the economy.



Goal 5: Striving for a circular economy (CE) (KPIs)



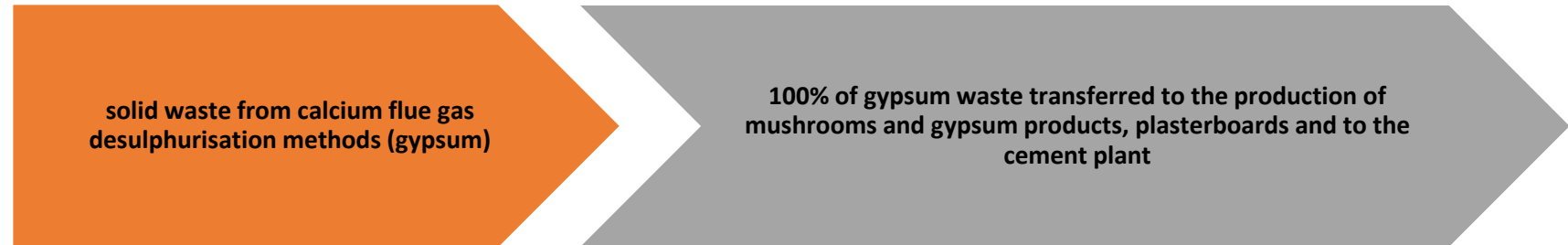
Meter definition	2023	2024	2025	2026	2027
degree of economic use of the raw material from flue gas desulphurization	~100%	~100%	~100%	~100%	~100%
degree of economic use of combustion waste	≥100% the level of the previous period	≥100% the level of the previous period	≥100% the level of the previous period	≥100% the level of the previous period	≥100% the level of the previous period
degree of economic use of demolition material	~100%	~100%	~100%	~100%	~100%



GOAL: Reuse as much waste as possible



GYPSUM WASTE



FURNACE WASTE



Goal 6: Being a good neighbor and a member of the local community: reducing the impact of current operations on the social and natural environment (steps) (1/2)

- **Ensuring high-quality operational management** - providing operational management systems that minimize the risk of anomalies and deviations, ensure the stability of plant operation and continuity of their production, minimizing the risk of environmental failure and maximizing safety for the natural and social environment.
- **Impact of mining activities on the environment** - monitoring and mitigating the impact of current mining activities on the social and natural environment (including impact on surface and underground waters, noise emissions, dust emissions from opencast mines related to mining, conveyor belt transport and erosion).
- **Reducing the emission of other gaseous and particulate pollutants emitted to the atmosphere from electricity generation** - optimization of the emission of pollutants such as NO_x, SO₂, and particulate matter adopted by the administration authorities for ZE PAK SA Group by maximizing the use of modernized installations and equipped with effective filters, while limiting the use of amortized installations and depleted until the complete cessation of energy production from lignite. Ongoing optimization of biomass units operation.
- **Application of BAT standards** - continuous or periodic monitoring of emissions of trace amounts of other pollutants, such as mercury, hydrogen chloride, hydrogen fluoride.



Goal 6: Being a good neighbor and a member of the local community: reducing the impact of current operations on the social and natural environment (steps) (2/2)

- **Mining damage** - reliable and timely estimation of the amount of mining damage, their repair or compensation for losses incurred by private persons and local government units by way of an amicable agreement.
- **Dialogue with local entrepreneurs directly or indirectly related to the work of ZE PAK SA Group** - openness to dialogue with local entrepreneurs who either cooperate with ZE PAK SA Group (subcontractors, suppliers) or are otherwise related to ZE PAK SA Group (e.g. fishing), responding to signals coming from them, understanding expectations, reassuring possible fears.
- **Local social commitment** - openness to dialogue with local communities: both representatives of local administration and local leaders. Focusing social involvement on local communities and their problems, in particular those communities that are in the sphere of influence of ZE PAK plants and projects implemented by ZE PAK Group, and for which the activities of ZE PAK SA Group are associated with nuisances.



Goal 6: Being a good neighbor and a member of the local community: reducing the impact of current operations on the social and natural environment (KPIs)



Meter definition	2023	2024	2025	2026	2027
number of major environmental accidents	"zero"	"zero"	"zero"	"zero"	"zero"
number of serious social conflicts	"zero"	"zero"	"zero"	"zero"	"zero"



GOAL

Supporting local communities through social involvement, so as to compensate, as far as possible, nuisances related to the operation of plants, where they cannot be eliminated or reduced



ACTIONS



We use the waste heat that accompanies the production of electricity from biomass to ensure stable electricity supplies for the city of Konin and to co-stabilize the national energy system



Konin energy basin has a unique cooling system based on an open water circuit. The lakes it covers are included in the cooling cycle of the Pątnów and Konin power plants. All lakes are connected by a system of canals with a total length of about 26 km and form a closed circuit in which the flow of water is regulated by culverts and pumping stations. Discharging waste heat to nearby lakes obviously affects their ecosystems, but it has also made these reservoirs **particularly valuable for fishing and fish farming**.



We have been cooperating for years with the **Polsat Foundation**, one of the largest non-governmental organizations operating in Poland, which has been directing its help to sick children and their parents for over twenty years.



We are a strategic partner of the **International Children's Song and Dance Festival** in Konin and the festival "For the Earth, for us" in Uniejów.



We promote and support various types of sports events.



We transfer the developed good standards of cooperation with local governments to other locations throughout Poland, where RES and hydrogen projects are developed.

Goal 7: Ensuring a high-quality management system and its continuous improvement, including social and environmental aspects in the decision-making process (steps) (1/2)

- **Management systems** - continuous improvement and maintenance of certified integrated management systems in the area of production and service works.
- **Human rights** - ensuring respect for human rights in the organization and in the supply chain, making employees and associates aware of them, as well as ensuring effective mechanisms for monitoring and preventing unacceptable behaviour.
- **Counteracting corruption and bribery** - ensuring and continuously improving procedures, training and internal control mechanisms relating to the risk of corruption and bribery.
- **Mechanisms for reporting irregularities and protection of „whistleblowers”** - ensuring effective internal procedures for reporting violations of the law (including anonymous reporting) and protection of the person reporting violations.
- **Diversity policy** - initiation of work aimed at developing a diversity policy corresponding to the specificity of the industry and the implemented business model.



Goal 7: Ensuring a high-quality management system and its continuous improvement, including social and environmental aspects in the decision-making process (steps) (2/2)

- **Ensuring effective reporting and transparency in the field of ESG** - publication of annual non-financial statements/reports to the extent that at least meets the legal requirements.
- **Effective internal control system** - ensuring effective internal procedures in force in the companies of ZE PAK Group, mechanisms for managing IT systems used for recording economic events and preparing financial and non-financial statements as well as data and system protection mechanisms, rules for supervision over the preparation of financial and non-financial statements, rules for verifying and evaluation of reports, internal audit and other elements of control.



Goal 7: Ensuring a high-quality management system and its continuous improvement, including social and environmental aspects in the decision-making process . (KPIs)

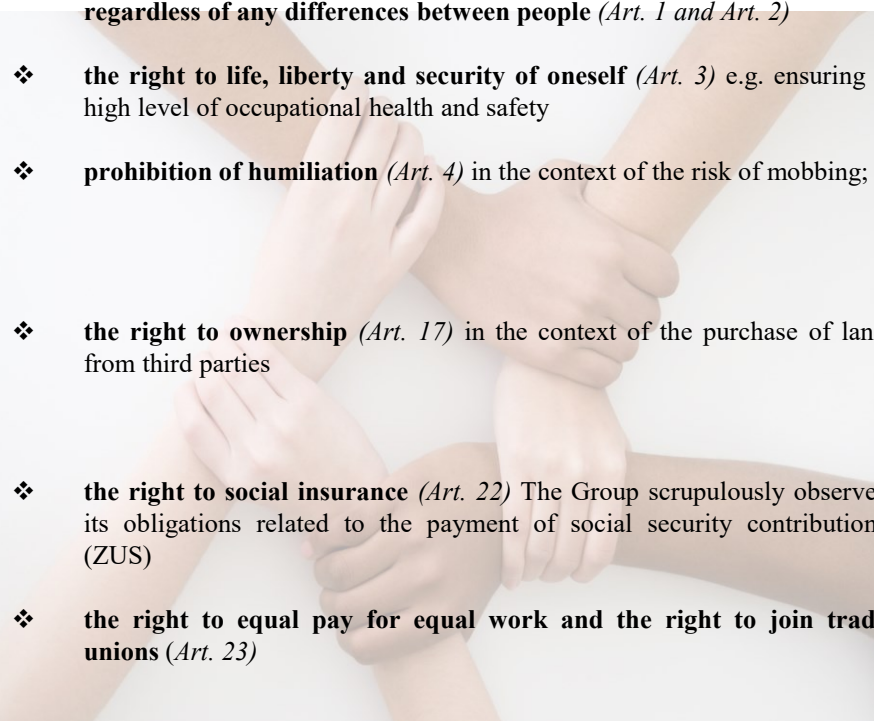


Meter definition	2023	2024	2025	2026	2027
number of significant fines or sanctions related to the violation of social and environmental interests, human rights, or confirmed practices of a corrupt, anti-market, monopolistic nature and related to the activities of ZE PAK SA Group	"zero"	"zero"	"zero"	"zero"	"zero"



Human rights issues of particular importance to the Group in accordance with the Universal Declaration of Human Rights

OUR ACTIONS

- 
- ❖ **recognition of the inalienable rights and dignity of the individual regardless of any differences between people** (*Art. 1 and Art. 2*)
 - ❖ **the right to life, liberty and security of oneself** (*Art. 3*) e.g. ensuring a high level of occupational health and safety
 - ❖ **prohibition of humiliation** (*Art. 4*) in the context of the risk of mobbing;
 - ❖ **the right to ownership** (*Art. 17*) in the context of the purchase of land from third parties
 - ❖ **the right to social insurance** (*Art. 22*) The Group scrupulously observes its obligations related to the payment of social security contributions (ZUS)
 - ❖ **the right to equal pay for equal work and the right to join trade unions** (*Art. 23*)
 - ❖ **the right to leave and rest** (*Art. 24*)

We respect diversity and at the same time do not accept any forms of discrimination or mobbing.

We eliminate or reduce threats and minimize the effects of accidents, if any, carried out on the basis of an occupational risk assessment.

ZE PAK SA has adopted the Code of Ethics, which is available to all employees on the Company's internal website. Not only does it guarantee the above-mentioned rights of the individual, but it is itself a tool to resolve potential conflicts. It contains a mechanism for both settling doubts and reporting suspicions of potential behavior that violates its provisions. The Code of Ethics also stigmatizes other behaviors that violate human rights, such as child labour, forced labor or slave labour.

We carry out land purchases in a way that limits negative emotions, these are always difficult situations, especially since real estate often has not only financial but also emotional value for its owners. These are often the households that are inherited by successive generations. However, limiting, and ultimately refraining from producing electricity based on lignite, will result in a slowdown and, ultimately, in the suspension of further land purchases.

The Group precisely complies with its obligations related to the payment of social security contributions (ZUS)

We provide procedural solutions in the field of fair remuneration, i.e. analogous remuneration for similar work, regardless of non-substantive differences between employees. Monitoring of the level of wages and possible differences in the level of remuneration due to gender was also initiated. Nevertheless, one should be aware of the strong domination of mining professions, as well as jobs in the energy sector by men. As a result, there is a relatively small percentage of women among the employees of ZE PAK SA Group, and what is more, they dominate in certain areas (finance, human resources).

The Group records due holiday days. It also actively supports the leisure and activities of employees (e.g. by subsidizing for holidays and offering sports passes). These issues have been formally regulated in the regulations of the Company Social Benefits Fund (CSBF).



CODE OF ETHICS

- ✓ adopted in 2017,
- ✓ is available to all employees on the Company's internal website,
- ✓ guarantees the rights of the individual,
- ✓ is a tool for resolving potential conflicts,
- ✓ contains a mechanism for both resolving doubts and reporting suspicions about potential behaviors that violate its provisions.

REGULATIONS FOR REPORTING VIOLATIONS OF LAW



ZE PAK SA and companies from the capital group employing more than 250 people (PAK KWB Konin SA, PAK Górnictwo sp. z o.o. and PAK Serwis sp. z o.o.) have adopted the "Regulations for reporting violations of the law", which includes:

- ✓ internal procedure for reporting violations of the law,
- ✓ follow-up procedure,
- ✓ whistleblower protection procedure.

