

Organization policy

on trade in goods, technologies and services of strategic importance with foreign partners

NITROERG S.A. trades in goods of strategic importance with foreign partners in accordance with the law of the Republic of Poland, international law and the rules adopted under non-proliferation agreements to which Poland is a party.

Being aware of our role in ensuring national and international security by preventing uncontrolled trade in products listed as dual-use and military goods, we have implemented in an informed and voluntary manner and we maintain an Internal Control System (**ICS**) at our Company.

In order to ensure supervision of compliance with national and international law as well as the established standards and operating procedures for control of trade in goods of strategic importance, the **ICS Director Representative** has been appointed.

If any transaction is found to be contrary to national law or there is a well-founded suspicion that a potential business partner violates international rules for trade in goods, technologies and services of strategic importance, including restrictions and embargoes, the transaction will not be finalised.

The organization excludes the possibility of making profit in a manner contrary to the trade control policy.

All employees, collaborating entities and persons who have been presented with the requirements of the Internal Control System shall be obliged to adhere to them and immediately notify the ICS Representative of any actual or attempted transactions or practices contrary to applicable law, and of any non-compliance of the system identified by them.

If any non-compliance with the requirements is found, the organization shall carry out appropriate eliminating, corrective and preventive measures.

The joint effort of all employees in the ongoing maintenance of the functional efficiency of the Internal Control System strengthens the trust in Our Company, makes it more competitive and credible.

The employees shall be strictly required to adhere to the rules stated in this document, the rules described in the Internal Control System Book and related documents, subject to disciplinary action.

PRESIDENT OF THE BOARD
General Director

Marek Mrówczyński

Bieruń, 15/10/2025