

INDEPENDENT AUDITOR'S REPORT FROM THE  
PERFORMANCE OF THE ASSURANCE SERVICE REGARDING  
THE ASSESSMENT OF THE REMUNERATION REPORT

**STALPRODUKT SPÓŁKA AKCYJNA**

with its registered office in Bochnia (32-700), at 69 Wygoda Street  
for the period from 1st January 2023 till 31st December 2023

**for the General Meeting of Shareholders and Supervisory Board  
of Stalprodukt S.A.**

**Introduction**

We have been engaged to evaluate the attached Remuneration Report of Stalprodukt S.A. (hereinafter referred to as the "Company") for 2023 in terms of completeness of the information contained therein required pursuant to art. 90g sec. 1 - 5 and 8 of the Act of July 29, 2005 on public offering and conditions for introducing financial instruments to organized trading and on public companies (i.e. Journal of Laws of 2024, item 620) (hereinafter "Act on public offering").

### **Identification of criteria and description of the subject of the service**

The Remuneration Report was prepared by the Supervisory Board in order to meet the requirements of art. 90g sec. 1 of the Public Offering Act. The applicable requirements regarding the Remuneration Report are contained in the Public Offering Act. These requirements provide the basis for the preparation of the Remuneration Report and are, in our opinion, appropriate criteria for our reasonable assurance conclusion. In accordance with the requirements of Art. 90g sec. 10 of the Public Offering Act, Remuneration Report is assessed by the statutory auditor in the scope of including the information required pursuant to Art. 90g sec. 1 - 5 and 8 of the Public Offering Act. This report fulfills this requirement. By the statutory auditor's assessment referred to in the preceding sentence and constituting the basis for our conclusion providing reasonable assurance, we mean the assessment of whether, in all material respects, the scope of information presented in the Remuneration Report is complete and the information has been disclosed with the detail required by the Act on Public Offering.

### **Responsibility of Members of the Supervisory Board**

Pursuant to the Act on Public Offering, Members of the Company's Supervisory Board are responsible for the preparation of the Remuneration Report in accordance with applicable law, and in particular for the completeness of this Report and the information contained therein. The responsibility of the Supervisory Board also includes design and implementation and maintaining an internal control system that ensures that a complete Remuneration Report is prepared that is free from material misstatement, whether due to fraud or error.

### **Auditor's Responsibility**

Our goal was to assess the completeness of the information contained in the attached Remuneration Report against the criterion set out in the Identification of criteria and description of the subject of the engagement section, and to express an independent conclusion based on the evidence obtained from the reasonable assurance engagement performed. We performed the service in accordance with the provisions of the National Standard of Assurance Services Other than Audit and Review 3000 (Z) as amended by the International Standard on Assurance Services 3000 (as amended) - "Assurance Services Other than Audit or Review of Historical Financial Information", adopted by Resolution No. 3436/52e/2019 of the National Council of Statutory Auditors of April 8, 2019, as amended (hereinafter: "KSUA 3000 (Z)"). This standard requires the statutory auditor to plan and perform procedures in such a way as to obtain reasonable assurance that the Remuneration report was prepared completely in accordance with the specified criteria. Reasonable assurance is a high level of assurance, but it does not guarantee that an service conducted in

accordance with KSUA 3000(R) will always detect a material misstatement when it exists. The procedures selected depend on the auditor's judgment, including the auditor's assessment of the risks of material misstatement due to fraud or error. In assessing these risks, the auditor considers internal control related to the preparation of a complete report in order to design appropriate procedures to provide the auditor with sufficient and evidence appropriate to the circumstances. The assessment of the functioning of the internal control system was not carried out in order to express a conclusion on its effectiveness.

### **A summary of the work done and the limitations of our procedures**

The procedures planned and carried out by us included in particular:

- reading the Remuneration Report and comparing the information contained therein with the applicable requirements;
- becoming acquainted with the resolutions of the General Meeting of the Company regarding the remuneration policy for Members of the Management Board and the Supervisory Board and the resolutions of the Supervisory Board detailing them;
- understanding the procedures adopted by the Supervisory Board to prepare the Remuneration Report, including understanding the relevant internal control procedures to the extent necessary to assess the risk of material misstatement or omission of significant information;
- establishing, by comparison with corporate documents, a list of persons who are required to include information in the Remuneration Report and determination, through inquiries of persons responsible for the preparation of the Remuneration Report, and where we deemed it appropriate also directly with persons who are required to provide information whether all information provided for in the criteria for the preparation of the Remuneration Report has been disclosed;
- where we deemed it appropriate to assess the compliance of the Remuneration Report with the applicable regulations, reconciliation of financial data on remuneration presented in the Remuneration Report to the accounting books or to relevant source documents;
- where we deemed it appropriate to assess the completeness of the Remuneration Report with applicable regulations, reconciliation with relevant source documents, whether non-financial information required to be disclosed in the Remuneration Report are supported by these source documents and do not omit important facts.

Our procedures were solely aimed at obtaining evidence that the information included by the Supervisory Board in the Remuneration Report, in terms of its completeness, complies with the applicable requirements. The purpose of our work was not to assess the sufficiency of the information contained in the Remuneration Report in terms of the purpose of preparing the Remuneration Report, nor to assess the correctness and reliability of the information contained therein, in particular as to the disclosed amounts, including estimates, numbers, dates, recognition broken down, allocation methods, compliance with the remuneration policy

adopted by the Management Board. The Remuneration Report was not audited within the meaning of the National Audit Standards. During the attestation procedures performed, we did not audit or review the information used to prepare the Remuneration Report and therefore assume no responsibility for issuing or updating any reports or opinions on the Company's historical financial information. We believe that the evidence we have obtained is sufficient and appropriate for us to express the following conclusion.

### **Ethical requirements, including independence**

When performing the service, the statutory auditor and the audit firm complied with the independence requirements and other ethical requirements set out in the International Code of Ethics for Professional Accountants (including the International Independence Standards) of the Council of International Ethical Standards for Accountants, adopted by the resolution of the National Council of Statutory Auditors No. 3431/52a/2019 of March 25, 2019 on the principles of professional ethics for statutory auditors (hereinafter the IESBA Code). The IESBA Code is based on the basic principles of integrity, objectivity and professional competence and due diligence, confidentiality and professional conduct. We have also complied with other independence and ethical requirements that apply to this assurance engagement in Poland.

### **Quality control requirements**

As an audit company, we apply the National Quality Control Standard 1 in the wording of the International Quality Management Standard (PL) 1 - "Quality management for companies performing audits or reviews of financial statements or commissioning other attestation or related services" introduced by the Council of the Polish Audit Oversight Agency by resolution No. 38/ I/2022 of November 15, 2022, which requires us to design, implement and maintain a quality management system, including policies or procedures regarding compliance with ethical principles, professional standards and applicable regulations and laws.

### **Conclusion**

The statutory auditor's conclusion is based on the matters described above, therefore the conclusion should be read with these issues in mind. In our opinion, the attached Remuneration Report, in all material respects, contains all the elements listed in Art. 90g sec. 1 - 5 and 8 of the Act on Public Offering.

### **Restriction of the use of**

This report was prepared by KPW Audyt Sp. z o. o. for the General Meeting of Shareholders and the Supervisory Board of Stalprodukt S.A. and is intended only for the purpose described in the section "Identification of criteria and description of the subject of the service" and should not be used for any other purposes. KPW Audyt Sp. z o. o. does not accept any contractual or non-contractual (including negligence) liability to third parties in connection with this report in the context of this report. The foregoing does not relieve us of our liability in situations where such exemption is excluded by law. The statutory auditor responsible for

the service resulting in this independent statutory auditor's report is Krzysztof Warczak, acting on behalf of KPW Audyt Sp. z o. o. with its registered office in Łódź (90-350), Tymienieckiego 25C/410, entered into the list of audit firms under number 4116, on behalf of which the statutory auditor conducted the service.

KPW Audyt Sp. z o. o.  
st. Tymienieckiego 25C/410; 90-350 Łódź

Krzysztof Warczak  
Key Statutory Auditor No. 11 939

KPW Audyt Sp. z o. o. is entered on  
the list of audit firms kept by the Polish  
Audit Oversight Agency under number 4116

Łódź, May 29, 2024