

# Risk management policy

## I. INTRODUCTION

### Article 1

The Risk management policy is adopted with the aim of better regulation and improvement of the Company's corporate governance system.

## II. PURPOSE AND OBJECTIVES OF THE RISK MANAGEMENT POLICY

### Article 2

The Policy is a set of rules by which the Company establishes mechanisms and measures for effective risk management within the Company.

## III. RISKS OF THE COMPANY

### Article 3

The Company faces the following business risks:

- 1) Financial risks (currency, interest rate, credit, price, liquidity risks and equity risks) - are related to financial variables and may cause difficulties in settling the Company's financial obligations, liquidity, debt management, etc.
- 2) Operational risks - can arise from inadequate use of information, omissions in operational management, non-compliance with internal procedures, human factor, IT systems (for example, threats to information security and competitors with new business models), financial reporting and related risk, etc.
- 3) Strategic risks – related to the corporate conduct, industrial changes, macroeconomic and market trends, acquisitions, business development, communication and investor relations, as well as natural disasters and catastrophe, pandemics, food shortages, civil riots, war, etc.; above mentioned risks are specific to the Company's business, over which Company has limited influence, as well as risks the Company can neither control nor influence.
- 4) Regulatory risks - may occur due to non-compliance with legal regulations issued by the state and local self-government or due to changes in tax and other regulations.

## IV. RISK MANAGEMENT MEASURES

### Article 4

The Company actively monitors risk levels and takes timely risk management steps.

Internal audit systematically assesses key risks, which are then quantified and ranked separately through the corporate risk matrix.

Each risk is valued in such a way that the probability of occurrence of a certain event as well as its impact on the business is estimated.

### Article 5

The risk management process consists of the following steps:

- 1) Identification of potential risks in business,
- 2) Risk analysis and assessment
- 3) Defining activities and assigning responsibilities to enable effective contribution to risk management,
- 4) Supervision and monitoring of initiatives aimed at avoiding the occurrence of risky events,
- 5) Exchange of information on the results of risk management managed by the Management Board.

### Article 6

Risk assessment is a part of regular business planning and, as such, should support better decision making and ensure that the Supervisory Board, the Management Board, as well as senior management, respond promptly to identified risks.

The Management Board is obliged to assess possible risks when setting certain strategic goals, and especially before concluding certain legal transactions that achieve the set strategic goals. Before concluding any such legal transaction, the Management Board is obliged to request the prior consent of the Supervisory Board in accordance with the internal acts of the Company.

## Article 7

At least once a year, the Audit Committee shall review the effectiveness of the risk management and internal control system as a whole and make recommendations to the Supervisory Board and Management Board of the Company if necessary.

The Audit Committee shall recommend the appointment or dismissal of the head of the internal audit function to the Supervisory Board.

Where there is no internal audit function, the Audit Committee should review the need for one once a year, as part of its review of the internal control system.

Persons responsible for maintaining the risk management system are required to cooperate with the Audit Committee in a manner that enables open, constructive, and effective exchange of information and opinions, in order to ensure timely and high-quality decision-making in the area of risk management.

## Article 8

Each department or sector of the Company is required to actively participate in the risk management system, in accordance with its responsibilities and scope of work.

Considering the above, each department or sector of the Company is required to undertake the following activities:

- 1) Identify and recognize risks arising from its operational, financial, technical, or managerial activities;
- 2) Assess and analyze identified risks with respect to their probability and potential impact on the Company's operations;
- 3) Propose and implement measures to prevent, mitigate, or eliminate identified risks within its area of responsibility;

- 4) Report in a timely manner to the Management Board and, where necessary, the Risk Management Committee on all identified risks, events, or changes that may affect the Company's overall risk level;
- 5) Cooperate with internal audit in the process of risk assessment and monitoring, and provide all necessary data and documentation;
- 6) Update internal procedures and controls in accordance with the recommendations of the Management Board, Supervisory Board, Audit Committee, and Risk Management Committee;
- 7) Improve awareness of the importance of systematic risk management within their department through training and internal communication.

The Company's Management Board coordinates and oversees the implementation of risk management activities by all departments and sectors, ensuring that risks are assessed, documented, and incorporated into the comprehensive corporate risk matrix.

## Article 9

The Risk Management Regulation regulates bodies, procedures, powers and responsibilities in the Company in cases of risks and/or threats to the Company's operations caused by external influences such as natural disasters, epidemics, pandemics, terrorist threats and other similar events and/or threats.

In accordance with the provisions of the Regulation on risk management in crises, the Risk Management Committee manages the risk.

Determined by the Management Board (November 24, 2025) and the Supervisory Board (December 1, 2025)