

Sustainability report

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ETAS 2 General Disclosures

About this report

The report presents sustainability information of the joint stock company PST Group (the Company; PST Group) and its subsidiaries (the Company together with its subsidiaries – the Group) for 2025 (the Sustainability Report), prepared in accordance with the European Sustainability Reporting Standards (ESRS).

BP-1 General basis for preparation of sustainability statements

The Sustainability Report presents consolidated sustainability information of all Group companies. Separate sustainability reports are not prepared for subsidiaries. The scope of sustainability information consolidation is consistent with that of the financial statements, ensuring consistency and alignment between financial and sustainability data (no Group companies are exempt from individual or consolidated sustainability reporting).

The Sustainability Report covers the Group's own operations and the upstream and downstream value chain. The Group did not use the ESRS exemption to omit confidential information, as no such information was identified.

The Company's management assesses that climate-related requirements do not cast doubt on the going concern assumption. The estimates and assumptions do not indicate a high risk of material adjustments to the carrying amounts of assets and liabilities or impairment of non-current assets and inventories.

BP-2 Disclosures in relation to specific circumstances

In this report, the Company applies the short-, medium- and long-term definitions set out in ESRS 1.

This Sustainability Report also includes the information required under Commission Delegated Regulation (EU) 2020/852 (the Taxonomy Regulation; the Taxonomy).

Appendix C to ESRS 1 provides that certain requirements are subject to phased-in application and may therefore be omitted in the first year of preparing the Sustainability Report. In July 2025, the European Commission also adopted the delegated act "Quick Fix", which allows those first-year reliefs to be applied for a further two years, for the 2025 and 2026 reporting periods.

Accordingly, the Group does not disclose in this report information on anticipated financial effects under SBM-1 paragraphs 40(b) and 40(c), SBM-3 paragraph 48(e), and the disclosure requirements E1-9, E2-6, E3-5, E4-6 and E5-6, to which this relief applies. Also applying the available reliefs, the Group does not provide in this report the information required under the disclosure requirements of E4, S1, S2, S3 and S4. However, in line with the BP-2 disclosure requirement, the Group still discloses information on material impacts, risks and opportunities, as set out in BP-2 paragraph 17(a)–(e).

Metrics that help disclose additional information specific to the Group's activities are marked in the report as **PST metric**.

The Sustainability Report did not undergo any other changes in its preparation or presentation compared with the previous period. No quantitative metrics with high measurement uncertainty were identified, and no material errors from the previous reporting period were detected.

Sustainability governance

GOV-1 The role of the administrative, management and supervisory bodies

The administrative, management and supervisory bodies of the PST Group are responsible for the management and oversight of the Group's companies. The Company's management consists of five senior executives: the Chief Executive Officer, the Technical Director (since 22 January 2025 – the Quality and Innovation Director), the Commercial Director, the Finance Director and the Projects Director (all are executive; 100% male). The Board is composed of 5 members, of which 2 (40%) are women and 3 (60%) are men, with a gender balance of 0.67:1. All Board members are non-executive, 2 members (40%) are independent. One member of the Board works for the Company as a consultant.

PST administrative, management and supervisory bodies have no directly appointed employee representatives. The Company has a Works Council with 7 members.

The members of the Board are qualified and competent to perform their functions and have extensive management experience. Although the Company's internal documents do not explicitly provide for an evaluation of the collective body's performance, the Company ensures that Board members possess diverse knowledge, perspectives and experience necessary for the proper performance of their functions.

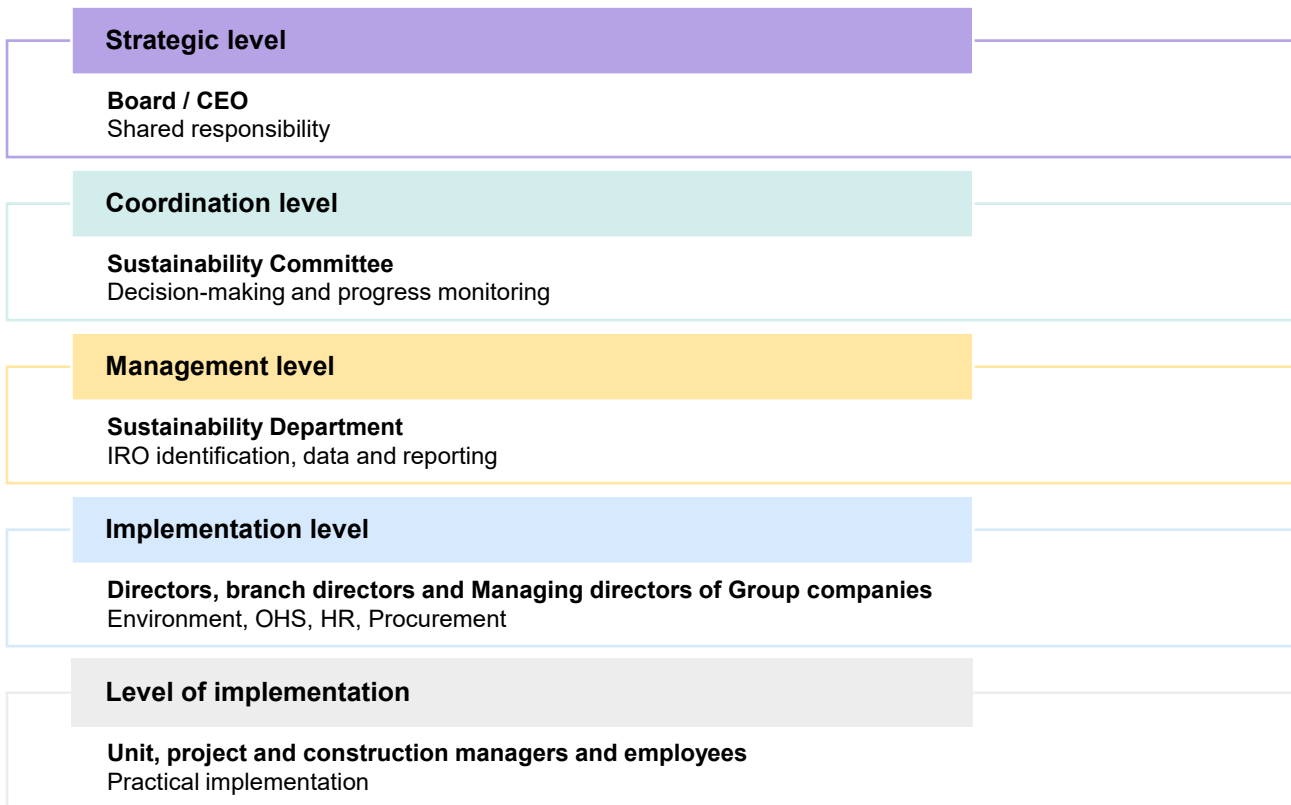
As the Group does not have a Supervisory Board, the Board also performs supervisory functions, approves the Group's strategy, and reviews and assesses its implementation. The Board, as the Company's collegial management body, performs the functions of the Nomination Committee and the Remuneration Committee. The Board appoints the Chief Executive Officer and approves the appointment of Directors proposed by the Chief Executive Officer. It regularly assesses their experience, professional skills and the implementation of the Company's strategic objectives, and hears their reports. The shareholders' meeting elects an audit committee for a period of one year. The committee consists of three members, two of whom meet the independence requirements. The Audit Committee provides a recommendation to the Board on the appointment of the audit firm or auditor.

Sustainability management structure and responsibilities

The Group has formally established and approved a Sustainability Governance and Responsibilities Framework defining the roles of the governing bodies and management in the area of sustainability. Sustainability governance in the Group is organised through clearly defined management levels, with key responsibilities presented in the table and governance structure chart below.

Management level	Key responsibilities
CEO	Ultimate responsibility for sustainability strategy and results.
Sustainability Committee	Coordination of sustainability matters, progress monitoring, and proposals.
Sustainability Department	Identification and assessment of IROs; data collection, analysis and verification; report preparation.
Directors / Branch Directors / Managing directors of Group companies	Management of sustainability risks and impacts within their areas of responsibility.
Heads of units, project managers, and construction managers	Coordination and monitoring of the implementation of measures.
Employees	Implementation of measures in day-to-day operations.

Group sustainability management structure



Management monitors impacts and risks and adjusts the strategy in response to changing circumstances. Responsible managers continuously monitor specific risks, take responsibility and make the necessary decisions. A management review is conducted annually, a report is prepared and submitted to the Board. Management regularly informs the Board and shareholders of decisions taken, including those related to managing impacts, risks and opportunities. Periodic performance and risk reports are submitted to the Board on a quarterly, half-yearly or annual basis. Meetings are also held to present progress and decisions taken.

The Company applies procedures of integrated quality, environmental, and occupational health and safety management systems. A list of material environmental considerations is being developed to effectively manage impacts and risks. Each year, a report on the implementation of the quality objectives and targets is produced. The Board reviews results, assesses progress and, where necessary, decides on further actions.

The Company ensures that members of its administrative, management and supervisory bodies are competent and have diverse knowledge, perspectives and experience necessary to perform their duties, including in matters of business ethics. For example, members of management with an understanding of the Group's material impacts, risks and opportunities hold relevant certificates and qualifications.

The CEO of the PST Group holds occupational health and safety and energy certificates, providing the competencies to identify, assess and manage related sustainability matters.

The Quality and Innovation Director holds an occupational health and safety specialist qualification and construction manager certificates qualifying him to serve as the construction manager and construction technical supervision manager of special structures. He has also completed first aid training and holds a lifting crane operations supervisor qualification, ensuring his ability to properly supervise and organise safe work with hazardous machinery.

External experts and (or) consultants are engaged as needed to strengthen management competencies in specific areas and ensure the highest standards of performance.

The education and experience of the Board members are described in more detail in the PST Group AB Company and Consolidated Management Report 2025 (the Management Report), section *Governance Report*.

GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

The Group ensures regular informing of the administrative, management and supervisory bodies on material impacts, risks and opportunities. These matters are periodically reviewed at Board meetings and Sustainability Committee meetings.

In 2025, the Board considered sustainability matters, including:

- Approval of the PST Group Sustainability Policy.
- The stakeholder engagement framework and communication channels.
- Stakeholder survey results on sustainability priorities.
- The value chain description.
- Double Materiality Assessment results and the substantiation of impacts, risks and opportunities.

The Sustainability Committee held two meetings in 2025. The Committee's agenda is planned one year in advance to ensure a systematic review of material sustainability topics and progress monitoring.

In response to ongoing structural changes, the Group continues to strengthen sustainability governance by refining responsibilities and integrating sustainability into its long-term strategy.

GOV-3 Integration of sustainability-related performance in incentive schemes

The Company currently has no sustainability-related incentive system or remuneration policy.

GOV-4 Statement on due diligence

The Group is not subject to legal requirements for sustainability due diligence. Therefore, it has no specific due diligence system in place. However, the Group continuously assesses potential negative impacts in its operations and value chain, seeks to prevent them and commits to remediation where it has caused or contributed to such impacts.

The Group's companies already apply elements of sustainability due diligence. The main aspects and steps outlined in ESRS 1 Chapter 4 Due Diligence relate to several horizontal and thematic disclosure requirements under ESRS.

A table showing how and where the key elements and stages of the due diligence process are reflected in this Sustainability Report is presented in the section *Key elements of due diligence*.

GOV-5 Risk management and internal controls over sustainability reporting

The Group seeks to ensure the quality, accuracy and reliability of sustainability information. A sustainability reporting risk management and internal control procedure is being developed, covering sustainability data reporting and control processes. The Sustainability Manager coordinates data collection, analysis and reporting processes, ensuring that information is collected in a timely manner complies with established standards.

Collected data are reviewed by the Sustainability team, which assesses their quality and prepares draft reports. The Finance Director and the Economics Department align the financial aspects of ESG metrics with the Group's accounting, while external consultants ensure data compliance and provide methodological guidance.

Additional control measures include standardised data collection, clear guidelines and timelines, and quality checks in specific areas (e.g. finance, occupational health and safety, quality, environmental and HR functions). These data reconciliations are important for accuracy and compliance with legislation and international commitments.

The Company's quality (ISO 9001), environmental (ISO 14001) and occupational health and safety (ISO 45001) management systems also support the management of sustainability-related processes and data.

Strategy, business model and value chain

SBM-1 Strategy, business model and value chain

PST Group and its Group companies are one of the largest construction groups in Lithuania, with more than 70 years of experience in the construction sector. The Group has implemented numerous significant and complex projects that have contributed to the country's economic growth, infrastructure development and environmental objectives. The Group operates in Lithuania, Latvia, Scandinavia and Poland. The Group's **activities** include construction and design of buildings, structures, facilities and utilities in Lithuania and abroad; production and design of metal structures; sale of construction materials; and real estate development. The Group's **clients** include both private and public sector customers, including municipalities.

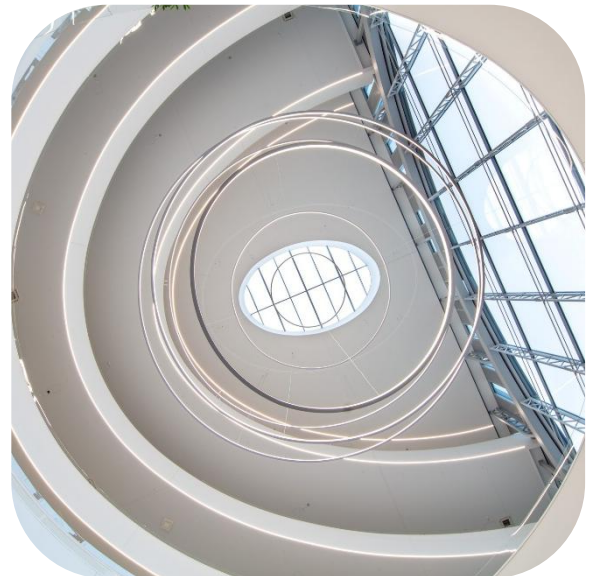
At the end of the reporting period (31 December 2025), the Group employed **538 employees**.

In November 2025, bankruptcy proceedings were initiated against the Group company UAB "Alinita", and in December 2025 bankruptcy proceedings were also initiated for UAB "Aliuminio fasada". These changes reflect a review of the Group's business portfolio and actions to improve operational efficiency to ensure the Group's long-term competitiveness.

Key strategic directions of the sustainability strategy

The Group is in the early stages of developing its sustainability strategy, is actively strengthening its sustainability-related processes, and intends to refine and integrate it into its long-term business strategy. The table outlines the main sustainability development directions and targets up to 2027.

A more detailed description of sustainability targets is provided later in this report, together with information in accordance with the topical standards.



Area	Direction	Target 2025 – 2026	Outcome in 2024	Outcome in 2025
Environmental protection	Reduction of GHG emissions in line with the European Green Deal and the Paris Agreement.	Calculate Scope 1, 2 and 3 GHG emissions and set substantiated GHG reduction targets.	Scope 1 and 2 emissions calculated	Scope 1, 2 and 3 emissions calculated
	Pollution prevention	0 pollutant leakage incidents annually	0	0
	Reduction and sorting of waste generated in operations.	Share of sorted waste \geq 70% annually	66%	75.3%
Social area	Ensuring the health and safety of workers and subcontractors	0 accidents annually	2	1 ¹
	Promoting a culture of diversity, equality and inclusion	Conduct an employee satisfaction/engagement survey. Provide at least one training session per year on diversity, equity and inclusion for employees.	<i>Not set</i>	An eNPS survey was conducted.
	Building an internal culture of sustainability	Provide employees with at least two training sessions related to achieving sustainability targets annually.	<i>Not set</i>	Training is planned for 2026.
		Ensure that at least 70% of employees participate in sustainability training and (or) at least one sustainability initiative ² annually.	<i>Not set</i>	In 2025, 7 initiatives were organised, with approx. 204 employees participating.
	Ensuring quality of services and buildings	Warranty maintenance costs $<$ 0.27% of total construction revenue annually.	0.27%	0.29%
Governance	Fostering a culture of business ethics	0 confirmed business ethics violations annually.	0	0
	Promoting responsibility in the supply chain	Develop a Supplier Code of Ethics integrating a supplier questionnaire on environmental and social matters. Ensure that at least 50% of suppliers and subcontractors declare compliance with the Code and submit completed questionnaires.	<i>Not set</i>	The Supplier Code of Ethics has been developed, and its application has been initiated through contractual commitments. The mechanism for collecting sustainability declarations is being established and gradually implemented.

Notes:

¹ The number of accidents in 2025 includes the Group's and subcontractors' employees. No accidents involving subcontractors occurred at construction sites controlled by the Group.

² Sustainability initiatives in the Group are defined as various educational, sports, environmental clean-up and team-building initiatives aimed at promoting employees' environmental and social engagement and awareness.

Value chain

Group company	Area of activity	Upstream (supply chain)	Activities of the Group's companies	Downstream
PST Group AB	Construction	<ul style="list-style-type: none"> - Subcontracting services - Raw materials, materials (from external companies), miscellaneous services - Leased machinery with operators - Leased scaffolding and formwork - Design 	<ul style="list-style-type: none"> - Construction - Subcontracting (some subcontractors are subsidiaries) - Construction work on own projects (small part) - Design services for external clients 	<ul style="list-style-type: none"> - Use of buildings and structures - Warranty service - Construction waste management - End-of-life maintenance of a building or structure
Vekada UAB	Services	<ul style="list-style-type: none"> - Equipment, materials and tools for the work - Leased machinery and equipment - Subcontracting services for the execution of works 	<ul style="list-style-type: none"> - Electrical installation works - Low-voltage works, including video surveillance systems, security and fire alarm systems, and building management systems 	<ul style="list-style-type: none"> - End use - Management of waste generated by the services
Kingsbud Spsl.zo.o.	Trade	<ul style="list-style-type: none"> - Imported building materials (sandwich panels, load-bearing roof sheets, thermal insulation materials, facade and interior tiles, carpets, PVC vinyl flooring) 	<ul style="list-style-type: none"> - Wholesale of building materials (Poland). Kingsbud has established a branch in Lithuania, whose main activity is the wholesale of porcelain stoneware and glazed tiles for interior and exterior finishing. - Most sales are carried out to the Group's companies (internally). 	<ul style="list-style-type: none"> - Transport (delivery) - Usage - Management of leftover building materials and packaging waste
UAB Šeškinės projektai	Real estate	<ul style="list-style-type: none"> - Materials, equipment, energy required for building maintenance and operation 	<ul style="list-style-type: none"> - Real estate rental (U219) 	<ul style="list-style-type: none"> - Building use (tenants) - Managing waste arising from building use and maintenance
Ateities projektai UAB	Real estate	Real estate	<ul style="list-style-type: none"> - Real estate development and rental (sale of previously built houses) 	<ul style="list-style-type: none"> - Real estate acquisition and use
Group companies that operate largely independently:				
Stadus UAB*	Production	<ul style="list-style-type: none"> - Wood raw material - Other construction materials and raw materials 	<ul style="list-style-type: none"> - Manufacturing, construction, and installation of timber panel structures and prefabricated houses 	<ul style="list-style-type: none"> - End use - Waste management arising from manufacturing, construction, and installation - Transport (export)
Hustal UAB	Production	<ul style="list-style-type: none"> - Metal raw materials - Other production materials (welding wire, paints) 	<ul style="list-style-type: none"> - Design, manufacture and installation of structural steelwork - Supply of metal structures to other industries 	<ul style="list-style-type: none"> - Usage - Waste management arising from manufacturing and installation

Notes: *Previously known as UAB Skydmedis.

SBM-2 Stakeholder interests and views

Stakeholder engagement

Key stakeholders	Engagement approach	Key topics of concern and engagement outcomes	How the Group considers engagement outcomes
Clients (customers)	<ul style="list-style-type: none"> - Ongoing collaboration on services and products. - Stakeholder survey. 	<ul style="list-style-type: none"> - Quality of services and buildings - Innovation - Sustainable solutions (Environmental impact of buildings and services) - Employee safety and well-being - Waste reduction and resource management - Employee training and education 	<ul style="list-style-type: none"> - Meeting client requirements for sustainable solutions (e.g. BREEAM, TIS2, or other standards) - The Group implements innovative, environmentally friendly solutions, ensuring that projects meet the highest quality standards. - Continuous improvement of services and process optimisation to enhance resource efficiency and reduce environmental impact. - Employees regularly attend training to deliver advanced and sustainable solutions to clients. - Active communication with clients to understand their needs and ensure smooth cooperation.
Employees	<ul style="list-style-type: none"> - Stakeholder survey (employees with an email address). Regular meetings with works councils and employee health and safety representatives to address quality, environmental, and OHS matters. Meetings at construction sites and production facilities are held as needed, but at least once a month (minuted). - The SAUGA.It digital platform enables employees to submit feedback and suggestions at any time. - Employee engagement in subsidiaries is ensured through meetings, works councils, employee representatives, and OHS committees. - Internal and external information exchange is governed by the procedure „Pasikeitimas informacija. KADSSVP-007“ (<i>Information Exchange. KADSSVP-007</i>). 	<ul style="list-style-type: none"> - Employee safety and well-being - Employee training and education - Waste reduction and resource management - Quality of services and buildings - Innovation 	<ul style="list-style-type: none"> - Working conditions are continuously improved and preventive measures are implemented to ensure employee health and safety. - Employee experience and suggestions are considered to improve work processes and optimise project execution. - Internal and external training programmes are implemented, providing opportunities for development and upskilling. - Employee initiative is encouraged to propose new solutions that improve work efficiency and reduce environmental impact. - A stakeholder survey is planned, involving all employees via the SAUGA.It OHS management platform.
Shareholders	<ul style="list-style-type: none"> - General meetings of shareholders are held. - Interim and annual reports on the Group's performance are published. 	All material topics.	<ul style="list-style-type: none"> - The Group's sustainability strategy is developed and updated; current actions are described in more detail in this report.

Key stakeholders	Engagement approach	Key topics of concern and engagement outcomes	How the Group considers engagement outcomes
Suppliers	<ul style="list-style-type: none"> - Constant communication in day-to-day operations. - Stakeholder survey. 	<ul style="list-style-type: none"> - Employee safety and well-being - Waste reduction and resource management - Quality of services and buildings Business ethics - Innovation - Reducing CO₂ emissions - Use of sustainable materials - Compliance with safety requirements - GDPR compliance - Digitalisation - Waste sorting - Use of green energy - Integrating electric vehicles into operational processes 	<ul style="list-style-type: none"> - The Group's processes, policies, and requirements are directly linked to the value chain and have an impact from the design stage to project completion. - More sustainable materials (e.g. with EPD certification) may be procured from suppliers as needed or based on client requirements.
Business partners (incl. subcontractors, consultants, and subcontractor employees)	<ul style="list-style-type: none"> - Site meetings are held at construction sites - Stakeholder survey. - Day-to-day communication in direct activities 	<ul style="list-style-type: none"> - Employee safety and well-being - Waste reduction and resource management Business ethics Water conservation and pollution reduction - Innovation - CO₂ emissions reduction and energy efficiency - Human rights - Building an internal culture of sustainability - Diversity, equality and inclusion 	<ul style="list-style-type: none"> - The Group ensures that subcontractors and their employees are engaged in occupational safety and sustainability initiatives through regular meetings and briefings. - Safety inspections and periodic audits are carried out on construction sites to assess the compliance of subcontractors. - The Group supports innovative solutions in the construction sector, encouraging subcontractors to use advanced technologies and reduce their environmental impact.
Affected communities (residents living near project sites)	<ul style="list-style-type: none"> - Pirminėse projektavimo stadijose vykdomas privalomas viešinimas, užtikrinant bendruomenės informavimą apie būsimus projektus. - In-person meetings are held with communities and residents living near project sites to discuss relevant topics, including sustainability. - Presentations of environmental impact assessment results. 	<ul style="list-style-type: none"> - Preserving residents' quality of life during project implementation - Availability of information on construction progress - Dust and noise during construction 	<ul style="list-style-type: none"> - Noise and dust abatement solutions are being implemented during construction, including irrigation systems, working time limits and other preventive measures. - Community feedback on environmental impacts is addressed promptly as needed. - Consistent and open communication with local residents is ensured through meetings, notices, and other communication channels.

Key stakeholders	Engagement approach	Key topics of concern and engagement outcomes	How the Group considers engagement outcomes
Users and end users	<ul style="list-style-type: none"> -End-user feedback through ongoing client communication. - Information on user experience is obtained during after-sales service, enabling assessment of service quality and improvement of solutions. 	<ul style="list-style-type: none"> - Sustainable solutions that save resources and add value for all. 	<ul style="list-style-type: none"> - Ensuring high quality products and services. - Investing in new technologies to improve energy efficiency. - The Group plans to develop its sustainability strategy; current actions are described in this report.
Supervisory authorities (Central Bank of Lithuania, State Tax Inspectorate, State Territorial Planning and Construction Inspectorate, National Labour Inspectorate, Labour Disputes Commission)	<ul style="list-style-type: none"> - Ongoing cooperation with public authorities to monitor regulatory changes and ensure compliance with legal requirements. 	All material topics.	<ul style="list-style-type: none"> - Prompt response to complaints, authority comments, and recommendations, ensuring implementation of relevant improvement measures. - Continuous monitoring of legal requirements and rapid adaptation to changes is ensured. - The Group plans to develop its sustainability strategy; current actions are described in this report.

Double materiality assessment

SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

The table below presents the Group's material (ESRS) sustainability topics, subtopics and their links to material impacts, risks and (or) opportunities. The topics were grouped to provide a comprehensive view and disclose all information that may be material to stakeholders. The Double Materiality Assessment was conducted for the first time in 2024, and in 2025 it was confirmed that the same results remain valid. The Group plans to review the Double Materiality Assessment results annually; therefore, the identified material topics and subtopics may change in the future.

Material sustainability impacts, risks and opportunities

ESRS/ sustainability topic	Material sub-topics	Material impacts, risks or opportunities		Position in the value chain	Materiality time horizon
E1 Climate change	Climate change mitigation Climate change adaptation Energy	Actual negative impacts	Direct and indirect greenhouse gas (GHG) emissions.	Entire value chain	Material across all time horizons
		Actual negative impacts	Buildings' CO ₂ (GHG) footprint over the entire building life cycle.	Entire value chain	Material across all time horizons
		Risks	Risk of inaccurate GHG calculation due to limited availability of supplier data.	Own operations	Material in the medium and long term.
		Risks	Insufficient reduction of the GHG footprint and failure to meet set targets.	Own operations	Material in the medium and long term.
		Risks	Rising taxes on fossil fuels and GHG emissions, and tightening regulatory requirements.	Own operations	Material in the long term.

ESRS/ sustainability topic	Material sub- topics	Material impacts, risks or opportunities		Position in the value chain	Materiality time horizon
E1 Climate change		Actual positive impacts	Use of green electricity in the Group's operations, promoting the transition to renewable energy sources.	Entire value chain	Material across all time horizons
		Opportunities	Reduced operating costs following the adoption of clean technologies in operations.	Own operations	Material in the medium and long term.
		Opportunities	Opportunity to offer more sustainable, lower GHG emission and energy efficiency-enhancing solutions in projects, helping clients achieve their sustainability targets.	Own operations and downstream value chain	Material in the long term.
E2 Pollution	Air pollution Water pollution Substances of concern Substances of very high concern	Potential negative impacts	Improper, unsafe and inefficient use and handling of hazardous chemicals during construction.	Own operations	Material across all time horizons
		Potential negative impacts	Particulate matter (dust), noise and dirt during construction.	Own operations	Material across all time horizons
		Potential negative impacts	Potential negative impacts on communities (noise, visual pollution) during project implementation.	Own operations	Material across all time horizons
		Actual negative impacts	Discharge of untreated wastewater into stormwater drainage systems (including pollutants from construction sites).	Own operations	Material across all time horizons
		Risks	Environmental incidents on construction sites (reputational damage, EPA fines, loss of ISO certification).	Own operations	Material across all time horizons
		Risks	Public nuisance such as noise, dust, light pollution and smoke emissions.	Own operations	Material across all time horizons
		Risks	Risk of non-compliance and inadequate management of water resources and wastewater.	Own operations	Material across all time horizons
		Opportunities	Environmental projects contributing to a positive corporate image and the upskilling of specialists (e.g. participation in EU and renovation projects).	Own operations	Material in the medium and long term.
	Air pollution Water pollution Soil pollution Contamination of living organisms and food resources	Actual negative impacts	Various types of environmental pollution are likely in the upstream value chain, particularly in raw material extraction and processing.	Upstream value chain	Material across all time horizons
		Actual negative impacts	Water pollution in the value chain associated with raw material extraction and the production of construction materials, particularly concrete and cement.	Upstream value chain	Material across all time horizons
		Potential negative impacts	Release of pollutants into water bodies and soil.	Upstream value chain	Material across all time horizons
	Microplastics	Actual negative impacts	Microplastic pollution across the value chain (use of plastics, plastic materials and fibres in construction and their disposal).	Entire value chain	Material across all time horizons
	Water pollution	Potential positive impacts	Water conservation, wastewater management and pollution reduction initiatives exceeding legal requirements.	Entire value chain	Material across all time horizons

ESRS/ sustainability topic	Material sub- topics	Material impacts, risks or opportunities		Position in the value chain	Materiality time horizon
E3 Water and marine resources	Water consumption	Actual negative impacts	Water consumption across the value chain (raw material extraction and the production of construction materials, particularly concrete and cement).	Entire value chain	Material across all time horizons
		Actual negative impacts	Water consumption during construction, depending on the type of project.	Own operations	Material across all time horizons
		Risks	Risk of non-compliance and inadequate management of water resources and wastewater.	Own operations	Material across all time horizons
E4 Biodiversity and ecosystems	Impacts on and dependencies on ecosystem services Climate change Direct use Pollution Impacts on the extent and condition of ecosystems	Actual negative impacts	Dependence on ecosystem services in raw material extraction (e.g. timber); potential indirect impacts on ecosystems in the upstream value chain.	Upstream value chain	Material across all time horizons
	Land-use changes, changes in freshwater use, and changes in marine use	Actual negative impacts	Changes in land and water use across the value chain, particularly in raw material extraction.	Entire value chain	Material across all time horizons
		Actual negative impacts	Changes in land use in own operations (e.g. drainage works, land levelling and construction on sites with modified land use).	Upstream and own operations	Material across all time horizons
E5 Circular economy	Resource inflows, including resource use Resource outflows related to products and services Waste	Actual negative impacts	Generation of hazardous and non-hazardous waste due to inefficient use of resources and the use of non-recyclable or non-reusable materials.	Entire value chain	Material across all time horizons
		Actual negative impacts	Resource use (construction is a resource-intensive activity; resource use is high across the value chain and generates waste).	Entire value chain	Material across all time horizons
		Potential positive impacts	Application of circular economy principles in operations and projects to minimise waste generation during construction and the building life cycle.	Entire value chain	Material in the long term
		Potential positive impacts	Reduced environmental pollution through responsible waste management, recycling and reuse (effective waste management control).	Own operations	Material in the long term
S1 Own workforce	Employee training and education	Potential negative impacts	Insufficient employee competence leading to inadequate service quality (negative impacts on clients and society).	Own operations and downstream value chain	Material in the short and medium term
		Potential positive impacts	Continuous training and upskilling enable employees to work more efficiently, support innovation and enhance the Company's competitiveness.	Own operations and downstream value chain	Material in the long term
		Opportunities	Upskilling of existing employees to increase productivity and efficiency and expand the range of services provided.	Own operations and downstream value chain	Material in the medium and long term.

ESRS/ sustainability topic	Material sub- topics	Material impacts, risks or opportunities		Position in the value chain	Materiality time horizon
S1 Own workforce	Employee safety and wellbeing	Potential positive impacts	Strong focus on building a health and safety culture, ensuring employees' physical and psychological well-being.	Own operations	Material in the medium and long term.
		Potential negative impacts	Potential workplace accidents.	Own operations	Material across all time horizons
		Risks	Fines and legal sanctions for breaches of occupational health and safety requirements.	Own operations	Material in the medium and long term.
		Risks	Data and information leaks may result in reputational damage, fines and legal consequences (e.g. due to GDPR breaches).	Own operations	Material across all time horizons
		Opportunities	Creation of a safe and healthy work environment, helping to increase employee motivation, reduce injury risk and improve performance.	Own operations	Material across all time horizons
	Diversity, equality and inclusion	Opportunities	Strengthening the organisation's image as a diverse, equitable and inclusive employer, attracting talented employees from different countries and social groups.	Own operations	Material in the long term
	Building an internal culture of sustainability	Risks	Perception of an unsustainable corporate culture that does not meet stakeholder expectations (banks, clients), leading to financial and reputational risks and loss of competitiveness.	Own operations	Material across all time horizons
		Opportunities	Strengthening the internal sustainability culture – developing and implementing a plan to embed sustainability culture processes, including training and other educational initiatives.	Own operations	Material in the long term
	S2 Value chain workers	Working conditions Other work- related rights	Potential negative impacts	Potential human rights violations affecting workers in the value chain.	Upstream value chain and own operations
S3 Affected communities	Land-related impacts	Risks	Potential community protests that may negatively affect the Company's reputation and lead to project delays.	Own operations and downstream value chain	Material in the medium and long term.
		Risks	Negative media engagement that may harm the public image and reduce trust in the Company.	Own operations and downstream value chain	Material across all time horizons
	Security-related impacts	Opportunities	Encourage voluntary initiatives that improve community well-being and strengthen corporate social responsibility.	Own operations and downstream value chain	Material in the long term
S4 Consumers and end users	Quality of services and buildings	Potential negative impacts	Inadequate quality of services and buildings, negatively affecting the safety, health and sustainability of end users.	Own operations and downstream value chain	Material across all time horizons
		Potential positive impacts	Search for, development and offering of more sustainable solutions to clients (benefits for society and clients).	Own operations and downstream value chain	Material in the medium and long term.

ESRS/ sustainability topic	Material sub- topics	Material impacts, risks or opportunities		Position in the value chain	Materiality time horizon
S4 Consumers and end users	Health and safety	Risks	Poor quality of works or products may result in additional financial impacts and reputational damage.	Own operations and downstream value chain	Material across all time horizons
		Opportunities	Additional efforts to identify and offer more sustainable solutions to clients, thereby increasing the Company's competitiveness, enhancing its reputation and expanding the range of services.	Own operations and downstream value chain	Material in the medium and long term.
G1 Business ethics	Sustainability in the supply chain Supplier relationship management, including payment practices	Potential negative impacts	Potential negative impacts on the environment and people in the upstream value chain (e.g. environmental incidents, human rights violations, breaches of health and safety requirements, breaches of business ethics, non-compliance with laws or lack of regulatory frameworks in certain countries of raw material origin).	Upstream value chain and own operations	Material across all time horizons
		Opportunities	Integration of sustainability principles in the supply chain can help the Company enhance its reputation, competitiveness and resilience to supply chain risks.	Upstream value chain and own operations	Material in the medium and long term.
		Risks	Irresponsible supplier selection and (or) poor-quality work (e.g. due to breaches of subcontractor agreements) may result in additional costs, disrupt the fulfilment of the Company's obligations and negatively affect its reputation.	Upstream value chain and own operations	Material across all time horizons
	Corporate culture	Risks	Non-compliance with applicable laws, rules and regulations, including compliance obligations.	Own operations	Material across all time horizons
		Risks	Corruption cases could result in significant reputational risk.	Own operations	Material across all time horizons
	Corruption and bribery	Opportunities	Strengthening the Company's image through the application of good business practices (increasing trust among potential clients and a more favourable public perception of the Group).	Own operations	Material across all time horizons

Information required under ESRS 2 SBM-3 paragraphs 48(b)–(c) is disclosed in other sections together with disclosures under the respective topical ESRS.

Financial effects of sustainability topics

Sustainability-related risks and opportunities had no material effect on the Company's financial position, financial performance or cash flows. No risks or opportunities have been identified that would materially change the carrying amounts of the Group's assets or liabilities in the near term.

The Group's resilience to sustainability-related risks has been assessed to the extent included in the Double Materiality Assessment. In addition, only the resilience of the Group's strategy and business model to climate change was assessed - the results of the assessment are presented in the section *Climate risk assessment*.

IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities

To identify and assess material impacts, risks and opportunities, the Group conducted a Double Materiality Assessment in accordance with ESRS criteria. ESRS does not prescribe a specific methodology for planning or conducting a Double Materiality Assessment; therefore, the Group, taking into account the nature of its activities and circumstances, as well as sustainability practices applied to date, developed a process in line with the criteria and guidance set out in ESRS 1. The Group relied on the general ESRS requirements and the practical implementation guidance issued by European Financial Reporting Advisory Group (EFRAG). The materiality analysis took into account both impact and financial materiality and their interrelationships.

Double Materiality principle:

- A sustainability matter is material from an impact perspective when it relates to the undertaking's material actual or potential, positive or negative impacts on people or the environment over the short-, medium- and long-term time horizons – an inside-out perspective.
- A sustainability matter is material from a financial perspective when it gives rise to risks or opportunities that have or may have a material effect on the undertaking's performance, financial position, financial results, cash flows, access to finance or cost of capital over the short-, medium- and long-term time horizons – an outside-in perspective.

The materiality assessment was conducted in consultation with external and internal experts, based on the best information available at the time of the assessment. It is noted that the Group continuously improves its processes for identifying actual and potential impacts, risks and opportunities; therefore, the list of sustainability topics identified in this assessment is not exhaustive and may be reviewed and, where necessary, revised or supplemented in the future.

Heads of departments and specialists responsible for areas related to the Group's material sustainability topics participated in the process of identifying and assessing material impacts, risks and opportunities, as identified in the previous materiality assessment and (or) listed in ESRS 1 AR 16 as sustainability matters to be considered in the materiality assessment.

The Group, based on ESRS criteria, assessed the materiality of each sustainability matter individually, taking into account the specific nature of its activities, the sector and its circumstances. In assessing materiality, the Group relied, to the extent possible, on objective information, expert insights and generally accepted scientific guidance. Impacts, risks and opportunities were assessed over the short-, medium- and long-term time horizons, consistent with the definitions set out in ESRS.

Key steps of the Double Materiality Assessment:

1. Understanding the operational context: value chain and business model.
2. Review of stakeholder views.
3. Identification of actual and potential impacts, risks and opportunities.
4. Assessment, review and approval of the materiality of impacts, risks and opportunities.

Impact assessment

The impact materiality assessment has been carried out taking into account the Group's material actual or potential, positive or negative impacts on people and the environment in the short, medium and long term. The materiality of actual negative impacts is based on the severity of the impact, while the materiality of potential negative impacts is based on their strength and likelihood. The severity of impacts was determined based on scale, scope and the irremediable nature of the impact. When assessing potential negative impacts on human rights, severity takes precedence over likelihood. The materiality of positive impacts, in the case of actual impacts, was based on scale and scope, and in the case of potential impacts, on scale, scope and likelihood. Based on the impact materiality assessment formulas, actual and potential impacts were classified

into three categories: *High* – very significant/material (final scores 15–25), *Medium* – material (4–14), and *Low* – immaterial (0–3).

In assessing impact materiality, the entire value chain of the Group's companies was analysed, taking into account the operations of the PST Group and its subsidiaries, business relationships, the geographical footprint of the value chain and affected stakeholders. Based on various sources (listed below) and information available to the Group, factors that may increase the risk of negative impacts in own operations and across the value chain were considered. The assessment was carried out by reviewing stakeholder views identified by the Group through ongoing stakeholder engagement in its operations (further disclosed under SBM-2 "Interests and views of stakeholders"), publicly available information from competent organisations and the stakeholder survey conducted during the previous materiality assessment.

To assess climate change risks and opportunities as accurately as possible, the Group conducted an assessment of transition and physical climate risks and opportunities. The results of this assessment are presented in detail in the section *Climate risk assessment and management* below.

Transition and physical biodiversity risks were not assessed separately, as the Group's companies are not located in or near protected biodiversity areas and no direct negative impacts on biodiversity have been identified in the Group's operations.

Risk and opportunity assessment

The assessment of financial materiality was carried out taking into account the magnitude of financial effects and the likelihood of risks and opportunities that may arise in own operations or across the value chain over the short-, medium- and long-term time horizons. Based on the financial materiality assessment formulas, the risks and opportunities were classified into three categories: *High* – very significant/material (final scores 15–25), *Medium* – material (4–14), and *Low* – immaterial (0–3).

Sustainability-related risks and opportunities may arise from the Group's impacts on the environment and stakeholders or from dependencies on resources. Therefore, the financial materiality assessment was performed together with the impact materiality assessment, first assessing impacts and then considering the links between impacts and dependencies in relation to risks and opportunities. During the Double Materiality Assessment, priority was given to sustainability-related risks, i.e. risks directly linked to the sustainability topics previously identified by the Group and those defined in the ESRS.

The Double Materiality Assessment was carried out by PST Group management members and specialists responsible for sustainability topics, and the results were reviewed and approved by the Board. Currently, the Group's processes for identifying, assessing and managing sustainability matters, including the assessment of risks and opportunities, are largely based on the application of ISO standards. The Company has implemented quality management (ISO 9001), environmental management (ISO 14001), and occupational health and safety (ISO 45001) management systems, which support the effective management of these sustainability matters. Occupational risks are assessed at each site, followed by analysis and the implementation of measures to eliminate or reduce risks. To protect environmental and natural resources and ensure pollution prevention, an environmental plan is prepared at the start of each project, setting out specific measures to manage material environmental aspects and activities.

The parameters of impact severity and likelihood, as well as the magnitude and likelihood of financial effects, were assessed based on available information from various sources:

- Policies, reports and internal documents developed and implemented by the Group.
- PST Group Risk and Opportunity Register 2024
- PST Group List of material environmental aspects in 2024
- Value chain analysis: nature of activities and geographic locations.

- Results of stakeholder (clients, suppliers, partners and employees) surveys conducted in 2023, as well as other information available to the Group on sustainability matters important to stakeholders.
- Results of a previous materiality assessment carried out in 2023 under the GRI guidelines.
- Information provided by competent international organizations, including studies and reviews on impacts typical of the sector's value chain (Leadership Group for Industry Transition report Towards a Sustainable Global Construction and Buildings Value Chain; United Nations and International Energy Agency publication GlobalABC Roadmap for Buildings and Construction).
- Annual reports of other industry players and their identified material topics.
- Industry rankings and materiality maps such as SASB and MSCI.
- The PST Company and Consolidated Annual Report 2023.

It should be noted that the Company, together with its subsidiaries, plans to review the Double Materiality Assessment process annually and update the information disclosed, as well as review and, where necessary, update stakeholder engagement methods.

IRO-2 Disclosure requirements in ESRS covered by the undertaking's sustainability statement

The Company's Sustainability Report is based on the Double Materiality Assessment, the process and results of which are described in detail in the **IRO-1** disclosure section.

The list of disclosure requirements complied with in preparing the Sustainability Report (ESRS content index) is presented in the section *ESRS Metrics List* of this report. The table of all data points required under other EU legislation referred to in Annex B of this standard is available in the section *ESRS Data Points under Other Legislation*. Climate change is a material topic for the Group and is included in this report.

MDR – Minimum Disclosure Requirements

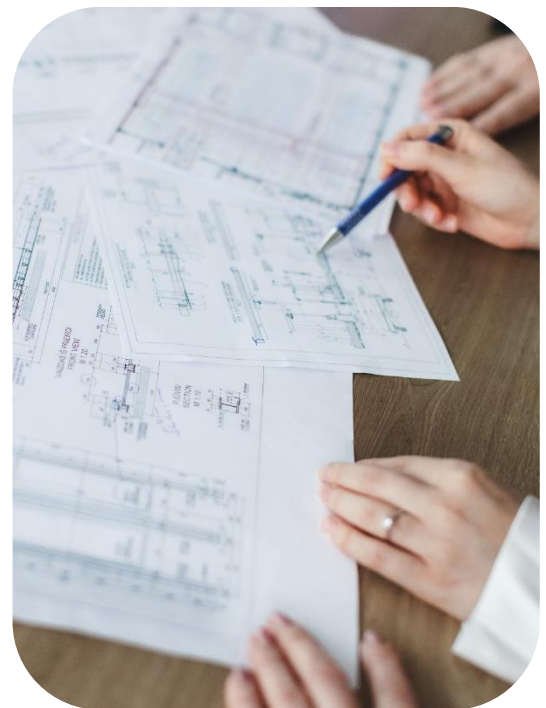
The Group applies and discloses information in accordance with the Minimum Disclosure Requirements on policies (MDR-P), actions (MDR-A), metrics (MDR-M), and targets (MDR-T), together with the relevant disclosure requirements set out in the topical ESRS later in this report.

MDR-P – Sustainability Policy

In 2025, the Group approved a Sustainability Policy to strengthen its sustainability management system. The Policy covers key environmental, social and governance (ESG) principles, priorities and commitments. The Policy defines the overall approach to integrating sustainability aspects into the Group's operations, decision-making and strategic planning. It is based on the European Sustainability Reporting Standards (ESRS), the European Green Deal, the United Nations Sustainable Development Goals, the Organisation for Economic Co-operation and Development Guidelines and the goals of the Paris Agreement.

The Group's Sustainability Policy covers all material impacts, risks and opportunities. The key commitments are as follows:

- Reduce the environmental impact of the Group's operations by consistently lowering GHG emissions, improving energy efficiency and using resources responsibly.



- Ensure a safe, healthy and inclusive working environment and strengthen employee well-being and competencies.
- Conduct operations in line with high standards of business ethics, transparency and anti-corruption.
- Apply responsible supply chain management principles and promote compliance with sustainability requirements across the value chain.
- Consistently monitor sustainability performance, disclose progress publicly and continuously improve governance practices.
- Develop dialogue with stakeholders and take their expectations into account in decision-making.

The Policy applies to all Group companies and their employees, ensuring a shared understanding of sustainability and consistent application of principles across the Group. The principles set out in the Policy are further detailed in other internal Group documents, strategies and action plans.

The Group's management is responsible for implementing the Sustainability Policy, following the sustainability management structure described in this report. The Policy is approved by the CEO's order, with the Board's endorsement, and is reviewed at least every two years.

The Sustainability Policy is communicated to the Group's employees through internal channels and is publicly available on the Group's website.

The Policy was developed taking into account the expectations of the Group's stakeholders and best practices, and its implementation is based on the principles of continuous improvement, transparency and accountability.

Climate risk assessment and management

In 2024, to prepare for CSRD sustainability reporting requirements, the Group conducted an assessment of climate change risks and opportunities in line with ESRS requirements. The assessment also considered the "Do No Significant Harm" criteria for climate change adaptation under the EU Taxonomy Regulation (Delegated Acts No. 2021/2178 and No. 2023/2486, Annex A). The assessment guidelines were prepared based on the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) and scenario analysis guidance for non-financial companies.

Physical climate risks and transition risks and opportunities were identified and assessed through scenario analysis. The assessment was carried out based on the best available information and is planned to be reviewed annually, and (or) when there are significant changes in operating conditions or updates to key forecasts of physical and transition events.

Assessment of physical risks

The assessment of physical risks was conducted proportionally to the scale and expected duration of the Group's operations. The following time horizons were defined for the assessment: short-term – up to 2026, medium-term – 2026 to 2030, and long-term – 2030 to 2050. These horizons were chosen considering that the Group's operations are adaptive and can be easily adjusted to climate-related physical events. Assessing beyond 2050 was deemed unnecessary, as climate projections for longer periods are highly uncertain and it is likely that the Group's direct operations would be adapted by then.

When assessing the Group's physical assets, longer-term risks (up to 2100) were also considered; however, no material risks to physical assets were identified. No hazards were identified in operations conducted outside Lithuania that could materially affect economic performance.

The assessment was based on the Ministry of Environment’s program Environment, Energy and Climate Change introductory report Preparation of Climate Change Forecasts up to 2100 ¹(forecasts on a 12x12 km grid) and the Study of Climate Change Risks for the Mid-21st Century² prepared by the Climate and Research Department of the Lithuanian Hydrometeorological Service (forecasts by districts). Based on the data provided in these sources, scenarios of typical air pollutant concentrations from the Intergovernmental Panel on Climate Change (IPCC), RCP4.5 and RCP8.5, were analyzed.

The Group assessed climate-related hazards across its operations and supply chain, including construction sites, based on the geographic locations of the sites. First, it was assessed whether the Group’s assets or operations would be negatively affected if a climate-related hazard occurred in its most extreme form, including in combination with other climate-related hazards. Then, it was assessed whether the potential negative impact on assets or business operations could materially affect economic performance. Where a negative impact on economic performance was identified as possible, the likelihood of the specific risk and the magnitude of the financial impact were further assessed. The materiality of risks was assessed based on a score calculated as the product of likelihood and financial impact: *High* – very significant/material (final scores 15–25), *Medium* – material (4–14), and *Low* – immaterial (0–3).

As the Group’s operations are not highly dependent on specific suppliers or supplier countries, physical risks in the supply chain were assessed only in the short term. If the supply of key raw materials and (or) materials is disrupted, suppliers can be replaced within less than one year.

This climate risk assessment of the Group should not be considered as ensuring the resilience of buildings and structures constructed on a contract basis. The Group did not assess the resilience of buildings and structures constructed based on client orders and designs to physical climate hazards, as such assessment should be carried out at the design stage of the building or structure.

The results of the physical risk assessment and adaptation measures are summarized in the table below.

Overview of the assessment of operational vulnerability to climate-related physical hazards

Classification of physical hazards		Potential negative impacts on operations or assets	Financial materiality assessment	Adaptation measures
Chronic*	- Temperature-related - Wind-related - Water-related - Related to solid matter	None	Immaterial	
Acute*	Temperature-related Heatwaves	In certain cases, there may be impacts on operational processes (e.g. work stoppages).	Immaterial	During heatwaves, standard adaptation measures are applied: working hours are adjusted and breaks are taken to cool down. In export markets, the climate is very similar, and the same adaptation measures are applied.

¹ Preparation of climate change forecasts, a national study on the vulnerability and sensitivity of Lithuanian municipalities to climate change, and the adaptation plan for the most vulnerable municipalities. I ETAPAS: KLIMATO KAITOS PROGNOZIŲ IKI 2100 METŲ PARENGIMAS. ĮVADINĖ ATASKAITA; Lietuvos Respublikos aplinkos ministerijos užsakymu parengta ataskaita, Ryga 2022 m.).

² Klimato kaitos rizikų XXI a. viduriui studija (Lietuvos hidrometeorologijos tarnybos, Klimato ir tyrimų skyrius; Lietuvos bankų asociacijos užsakymu atlikta analizė, Vilnius 2023 m.).

Classification of physical hazards			Potential negative impacts on operations or assets	Financial materiality assessment	Adaptation measures
Acute*	Temperature-related	Cold waves or frost	Cold conditions may limit operations, and during cold waves certain activities may be suspended in accordance with legal requirements.	Immaterial	Current processes are adapted to cold conditions, for example, work schedules are adjusted. According to the scenarios analyzed, the projected decrease in cold conditions could ease current circumstances.
		Wildfires	To date, the Group has not experienced operational disruptions due to wildfires. The likelihood of exposure to this hazard would arise when constructing projects in forested areas.	Immaterial	Currently, operations are not carried out in or near forested areas where wildfires could occur.
	Water-related	Heavy precipitation (rain, hail, snow or ice)	Very heavy, sudden and intense precipitation could cause damage to physical assets, such as vehicles and building structures (e.g. roofs).	Immaterial	The installation of drainage systems is planned to reduce rainwater accumulation and flood risk.
		Droughts	More frequent droughts could increase dust levels during construction activities. New requirements for the implementation of dust mitigation measures may emerge.	Immaterial	Standard dust mitigation measures are applied. To reduce dust dispersion in high winds, water spraying systems are used. Fine materials (e.g. sand or gravel) are covered with protective covers to prevent them from being blown away.
	Wind-related	Storms	Storms may lead to work stoppages and higher costs for the implementation of adaptation measures.	Immaterial	Work is planned taking into account seasonal weather patterns and forecasts. All temporary installations, construction equipment, site containers and materials are securely fixed. Storage of construction materials at work sites is limited to the quantity required for one shift. Protective barriers are installed to reduce the movement of sand and dust. Temporary coverings or sheeting are installed on partial structures or sensitive components. Lifting operations are suspended when wind speeds exceed 15 m/s. Weather monitoring systems are used at construction sites, including alerts for approaching storms.

Notes: * During the climate risk assessment, the full list of physical hazards set out in Annex A to Commission Delegated Regulation (EU) 2021/2139 was considered. The table presents summary information only on hazards that are relevant, i.e. those that may have a negative impact on physical assets or operations. Hazards that would not result in negative impacts are not detailed in the table.

Assessment of transition risks and opportunities

The following time horizons were defined for the assessment of transition risks: short-term – up to 2026, medium-term – 2026 to 2030, and long-term – 2030 to 2050. The Group analyzed expected and potential developments under a net-zero emissions by 2050 scenario, aligned with the goals of the Paris Agreement

and the European Green Deal to achieve climate neutrality by 2050. The assessment was conducted in line with TCFD recommendations, considering its classification of climate-related transition events.

The climate risk assessment is preliminary, as the Group has not yet calculated Scope 3 GHG emissions or developed a Transition Plan. The assessment will be refined once the Transition Plan is developed and all Scope 1, 2 and 3 GHG emissions are assessed.

The key assumptions considered and the identified transition risks and opportunities are summarized in the table below.

Overview of the assessment of climate-related transition risks

Meaning of the colors used in the tables:

No risks or opportunities	Low – immaterial	Medium – materiality	High - very significant/material
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Risk assessment					
Transition events (TCFD)		Potential financial impacts	Materiality assessment		
			2026	2030	2050
Politics and law	Higher GHG emissions pricing	No material risks are anticipated, as increases in raw material prices (e.g. cement) are likely to affect the entire sector equally.			
	Increased GHG emissions reporting obligations	Risk that subcontractors and suppliers may not be able to accurately calculate and report their GHG emissions footprint due to increasing complexity and a larger number of assessed components. This may limit the choice of subcontractors and increase project costs. However, all sector participants are expected to adapt, so this risk is considered low (not material).			
		Reputational and financial risk if the Group fails to achieve its GHG reduction targets on time.			
	Requirements and regulation related to existing products and services / production processes	<i>No risks are anticipated</i> , as regulation affects the entire market and the Group is capable of meeting new requirements and responding to the growing demand for green buildings and renovations.			
	Litigation risk	The risk of legal disputes related to non-compliance with GHG emissions or energy requirements remains, but no increase is expected. Project and construction supervision is organized to comply with applicable requirements.			
Technology	Cost of switching to less polluting technologies	Significant investments in equipment renewal – costly machinery may require substantial financial resources. However, the Group leases part of its key construction equipment (e.g., cranes) together with services from suppliers, thereby avoiding part of the investments in equipment acquisition and maintenance.			
	Unsuccessful investments in new technologies	Uncertainty when investing in new technologies and the risk that the investments may not pay off. The risk is managed through gradual investment, based on industry experience and consistent analysis of returns and risks.			
	Replacement of the Company's existing products and services with less polluting alternatives	<i>No risks are anticipated</i> , as construction services are not easily substitutable and the sector remains stable. Stadius UAB is expected to expand its operations, and the metal sector is also likely to remain difficult to substitute.			

Risk assessment					
Transition events (TCFD)		Potential financial impacts	Materiality assessment		
			2026	2030	2050
Market	Changes in customer behaviour/priorities	<i>No risks are anticipated, as the number of clients educated in sustainability is expected to increase over time, and no direct impact on the Group's operations is expected. This trend is assessed more as an opportunity.</i>			
	Uncertainty in market signals	<i>No risks are anticipated, as demand for sustainable buildings and infrastructure is expected to grow even under a business-as-usual scenario.</i>			
	Rising raw material prices	<i>As high-carbon construction materials (e.g., cement, metals) become more expensive in the coming years, construction costs are expected to increase, which may lead to higher prices for services and products. However, as this trend will affect the entire sector equally, the financial impact on the Group's companies remains low.</i>			
Reputation	Changes in consumer preferences	<i>No risks are anticipated.</i>			
	Increased stakeholder concerns	<i>No risks are anticipated, as comprehensive sustainability documentation is already required in project financing, affecting the entire market and being relevant to project developers, but not expected to materially affect the Group's operations.</i>			
	Negative feedback from stakeholders	<i>No risks are anticipated.</i>			
	Stigmatisation of the sector	<i>No risks are anticipated, as the entire sector is undergoing transformation, and solutions to achieve climate targets in the buildings and construction sector are already developed and continuously improved.</i>			

Overview of the assessment of climate-related transition options

Opportunity assessment					
Transition events (TCFD)		Potential financial impacts	Materiality assessment		
			2026	2030	2050
Politics and law	Higher GHG emissions pricing	<i>Opportunities are anticipated due to increasing prices of polluting raw materials (see “Market”, “Increased raw material prices” below).</i>			
	Increased GHG emissions reporting obligations	Opportunity to strengthen cooperation with clients and subcontractors by informing them about upcoming GHG emissions calculation and reporting requirements, thereby ensuring smoother adaptation to regulatory changes.			
	Requirements and regulation related to existing products and services / production processes	Growing demand for new and repeated renovation projects leads to increasing volumes of work. However, this opportunity is assessed as not material (low), as renovation works currently do not constitute a material share of operations and are not expected to increase significantly in the medium or long term.			
	Litigation risk	<i>No opportunities are anticipated.</i>			
Technology	Cost of switching to less polluting technologies	<i>No opportunities are anticipated.</i>			
	Unsuccessful investments in new technologies	<i>No opportunities are anticipated.</i>			
	Replacement of the Company’s existing products and services with less polluting alternatives	<i>No opportunities are anticipated.</i>			
Market	Changes in customer behaviour/priorities	Opportunity to strengthen the Group’s market position, aiming to become a leader in sustainability. PST is prepared to meet the expected growing demand for sustainable solutions, strengthening its competitive advantage.			
		Opportunity to benefit from the growing demand for green buildings and sustainable solutions – buildings with sustainability certifications may be sold or leased faster and at above-market prices. However, this trend depends on clients’ priorities. Although the number of such clients is increasing due to tightening regulatory requirements, this opportunity is currently assessed as not material (low).			
		Opportunity to benefit from the growing demand for panel renovation – a growing market may increase demand for Stadius UAB products and services, providing expansion opportunities.			
	Uncertainty in market signals	<i>No opportunities are anticipated.</i>			

Opportunity assessment					
Transition events (TCFD)		Potential financial impacts	Materiality assessment		
			2026	2030	2050
	Increased raw material prices	Opportunity to expand the use of less polluting and less regulated materials – as the prices of traditional construction materials increase, Staudis UAB may offer alternative solutions, thereby strengthening its competitive position in the market.			
Reputation	Changes in consumer preferences	<i>No opportunities are anticipated.</i>			
	Increased stakeholder concerns	<i>No opportunities are anticipated.</i>			
	Negative feedback from stakeholders	<i>No opportunities are anticipated.</i>			
	Stigmatisation of the sector	<i>No opportunities are anticipated.</i>			

PST

**Environmental
area**

Environmental impacts, risks and opportunities

SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model (Environmental sustainability topics)

The Group companies operate in the construction sector, which is one of the largest resource consumers and significantly contributes to climate change. The construction sector is estimated to account for 50% of global resource extraction and 37% of total greenhouse gas (GHG) emissions across the full building lifecycle, from construction material production to building operation and demolition.

In environmental sustainability, the construction sector encompasses all key sustainability topics: climate change, pollution, water and other resource use, biodiversity, and the circular economy. The most significant impacts arise in the upstream stages of the value chain, particularly in construction material production, from natural resource extraction to final product manufacturing.

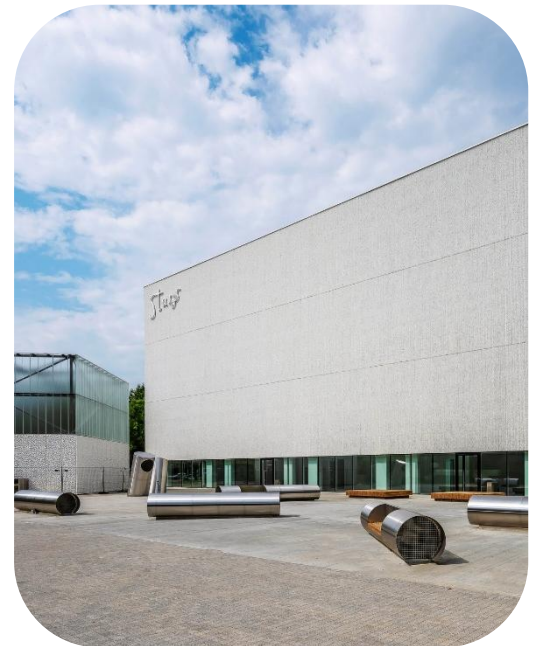
Although the direct operations of the Group companies have a limited impact, construction sector-related impacts also occur in the Group's projects to a lesser extent. Construction involves extensive use of materials and raw inputs and generates significant amounts of waste. In addition, certain forms of pollution are unavoidable: noise, dust, particulate matter, wastewater, and mud generated on construction sites, which may have a temporary environmental impact. Depending on the type of asset constructed, direct impacts on biodiversity may arise, such as land sealing. However, most projects of the Group companies are carried out in urban areas, therefore direct negative impacts on biodiversity are minimal. There are no material locations of the Group's operations that adversely affect biodiversity areas.

The Group companies comply with all applicable environmental legislation and aim to consistently reduce negative environmental impacts. Given the nature of operations, the main environmental impacts align with risks and impacts typical of the construction sector. In 2025, the Group strengthened sustainability management in the value chain by approving the Supplier Code of Ethics and supplier questionnaire to promote responsible supplier conduct and reinforce the commitment to the Group's ethical and environmental principles. The Group's environmental impact will remain relevant in the future and will therefore be continuously monitored and managed.

The Group has not prepared a formal Transition Plan; however, its adoption is planned for 2026 – 2027, once indirect Scope 3 emissions are calculated. Nevertheless, the Group commits to aligning with the goals of the European Green Deal and the Paris Agreement; therefore, the management of its impacts, risks and opportunities will be integrated into the future strategy.

Environmental risks and opportunities had no material effect on the Company's financial position, financial performance or cash flows during the reporting period. No risks or opportunities have been identified that would materially change the carrying amounts of the Group's assets or liabilities in the near term.

For detailed information on the resilience of the Group's strategy and business model to climate change, see the section *Climate risk assessment*. For other environmental aspects, the resilience of the Group's operations was assessed to the extent included in the Double Materiality Assessment.



Environmental policy

MDR-P Policies adopted to manage material sustainability matters (Environmental sustainability topics)

The Sustainability Policy, which covers all environmental topics, is described in more detail in the section **MDR-P - Sustainability Policy**. In addition, to manage environmental impacts, risks and opportunities, the Group follows the **Environmental Policy**, which establishes clear environmental responsibility principles:

- Assume responsibility for the environmental impact of operations and seek to ensure it is minimised.
- Reduce contamination of soil and groundwater from fuels, lubricants and hydraulic oils.
- Identify and assess opportunities and risks to ensure compliance with all environmental requirements.
- Ensure minimal environmental impact in both minor construction works and the implementation of complex and innovative construction projects.
- Implement the latest technological solutions to enable safer and more efficient operations.
- Reduce construction waste and ensure its sorting.
- Protect the natural environment from negative impacts and educate employees to enhance their environmental awareness and competencies.

The Group holds an **ISO 14001** Environmental Management System certificate, confirming high environmental protection standards. The Group ensures compliance with all applicable environmental legal requirements in its operations, and no environmental violations were recorded in 2024 – 2025.

The Group's Environmental Policy applies to the direct operations of PST Group and its subsidiaries. To ensure transparency and employee engagement, the Environmental Policy is publicly available on the PST Group website and on notice boards in administrative buildings and construction sites.

Training on environmental practices is provided to employees and partners and is conducted during audits. Regular production, occupational safety and health (OSH), and environmental meetings are held at construction sites with clients, subcontractors and suppliers. In addition, employee representatives on the OSH Committee and the Works Council ensure the dissemination of the policy and its proper implementation.

Environmental metrics

E1 Climate change

E1-1 Transition plan for climate change mitigation

The Group has not prepared a formal Transition Plan; however, its adoption is planned for 2026 – 2027, once indirect Scope 3 emissions are calculated. Nevertheless, the Group is committed to the European Green Deal and the Paris Agreement.

E1-2 Policies related to climate change mitigation and adaptation

The Group's overarching policy and management system covering all environmental topics is described at the beginning of the section *Environmental Policy*.


E1-3 Actions and resources in relation to climate change policies

Existing actions and investments:

- The Group purchases 100% green (renewable source) electricity, certified by guarantees of origin.
- Investments are made in the development of solar power plants. In 2025, the Group additionally leased a remote solar power plant (capacity: 0.9 MW). In 2025, PST Group AB generated 50.97% of the electricity required for its own needs from renewable energy sources, significantly more than in the previous period. At the Group level, this metric amounted to 21.25% (2024: 21.5%). Although the

relative share at the Group level remained similar, the total amount of energy generated increased significantly.

- An administrative building in Panevėžys was renovated: lighting was modernised (LED installed), and the heating system was upgraded (pipelines and radiators replaced, and digital heat substation control installed).
- The vehicle fleet is being renewed (through vehicle leasing) with newer, lower-emission vehicles.

 **Plans for 2026 – 2027**

- **Set GHG emission reduction targets based on the calculated total GHG emissions.**
- **Modernise the vehicle fleet by gradually transitioning to lower-emission or electric vehicles.**
- **Expand the solar power plant portfolio so that a larger share of consumed energy is generated from renewable sources.**
- **Continue electricity consumption reduction projects by promoting efficiency measures and responsible energy use.**
- **Implement new technologies in the construction process to reduce waste and energy consumption.**

A specific action plan covering GHG emission levels, decarbonisation measures and the resources allocated for their implementation will be defined upon the adoption of the GHG emission reduction plan.

E1-4 Targets related to climate change mitigation and adaptation

The Group plans to adopt a Transition Plan in the future and commit to achieving net zero emissions by 2050. The Group has not set specific GHG emission reduction targets at this stage. The Group assesses the effectiveness of its actions by calculating Scope 1 and Scope 2 GHG emissions in accordance with the GHG Protocol and by monitoring energy consumption.

E1-5 Energy consumption and mix

Energy consumption and mix

Energy consumption and mix	2024	2025	Change 2025/2024
(1) Fuel consumption from coal and coal products (MWh)	0	0	-
(2) Fuel consumption from crude oil and petroleum products (MWh)	7,468.5	5,614.5	-25%
(3) Fuel consumption from natural gas (MWh)	208.5	274.0	31%
(4) Fuel consumption from other fossil sources (MWh)	0	xx	xx%

Energy consumption and mix	2024	2025	Change 2025/2024
5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)	1,547.9	xx	xx%
(6) Total fossil energy consumption (MWh) (calculated as the sum of lines 1 to 5)	9,224.9	6,628.3	-28%
Share of fossil sources in total energy consumption (%)	85%	82%	-3%
(7) Nuclear fuel consumption (MWh)	0	0	-
Share of consumption from nuclear sources in total energy consumption (%)	0	0	-
(8) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	357.3	41.2	-88%
(9) Consumption of purchased renewable electricity, heat, steam, and cooling (MWh)	836.8	650.2	-22%
(10) Consumption of self-generated renewable non-fuel energy (MWh)	427.3	773.0	81%
(11) Total renewable energy consumption (MWh) (sum of rows 8–10)	1,621.4	1,464.4	-10%
Share of renewable sources in total energy consumption (%)	15%	18%	+3%
Total energy consumption (MWh) (calculated as the sum of lines 6, and 11)	10,846.3	8,092.7	-25%

Note: The Group's self-generated non-renewable energy amounted to 274.0 MWh (2024: 208.5 MWh), and self-generated renewable energy amounted to 814.2 MWh (2024: 784.6 MWh).

Energy intensity

Energy intensity per net revenue	2024	2025	Change 2025/2024
Total energy consumption from activities in high climate impact sectors per net revenue from activities in high climate impact sectors (MWh/Eur)	0.00010773	0.00006752	-37.33%

Notes: All of the Group's activities are classified as activities in sectors with a high climate impact. Group companies operate in the construction sector (NACE code F – Construction), and all Group revenue is generated from activities in sectors with a high climate impact. Reconciliation of net revenue (denominator used to calculate energy consumption intensity) with the corresponding line item in the financial statements: Consolidated statement of comprehensive income", line "Revenue from contracts with customers" („Konsoliduota bendrujų pajamų ataskaita“, eilutė „Pajamos pagal sutartis su klientais“).

E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions

The table below presents the Group's calculated GHG emissions, expressed in carbon dioxide equivalent (CO₂e). The know-how and methodologies of market-based financial institutions and energy suppliers were used to calculate GHG emissions. The calculation is based on the GHG Protocol guidelines.

The calculation of emissions includes not only CO₂ but also other greenhouse gases (N₂O, CH₄, HFCs), which are converted into CO₂ equivalent using established standard factors. The final emission amount is presented as total CO₂e.

Emission consolidation method: operational control. The calculations include all activities of the Group's controlled entities that generate Scope 1 and Scope 2 emissions.

The base year selected for GHG calculations is 2024. This is the first year in which PST Group assessed its emissions in full, including all Group entities.

Sources of emission factors used:

- IPCC (Intergovernmental Panel on Climate Change).
- Sources for the IPCC AR5 report.
- European Environment Agency guidelines for air pollution inventories.
- Association of Issuing Bodies (AIB) - Residual mix and Production mix data for electricity.

GHG emissions

Emission type	2024			2025			Change 2025/2024		
	PST Group AB	Other Group companies	Group	PST Group AB	Other Group companies	Group	PST Group AB	Other Group companies	Group
Scope 1 GHG emissions									
Gross Scope 1 GHG emissions (tCO ₂ eq)	1,669	365	2,033	1,271	275	1,547	-24%	-25%	-24%
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	0	0	0	0	0	0	-	-	-
Scope 2 GHG emissions									
Gross Scope 2 GHG emissions market-based (tCO ₂ eq)	410	40	450	25	16	41	-94%	-60%	-91%
Gross Scope 2 GHG emissions location-based (tCO ₂ eq)	160	69	229	52	55	107	-68%	-20%	-53%
Significant scope 3 GHG emissions				Group					
Gross indirect (Scope 3) GHG emissions (tCO ₂ eq)				36,456					
1. Purchased goods and services				33,832					
2. Tangible fixed assets				399					
3. Fuel and energy related activities (not included in Scope 1 or 2).				480					
5. Waste generated in operations				5					
6. Business traveling				140					
7. Employee commuting				330					

Emission type	2024			2025			Change 2025/2024		
	PST Group AB	Other Group companies	Group	PST Group AB	Other Group companies	Group	PST Group AB	Other Group companies	Group
13. Downstream leased assets				1,271					
Total Scope 1 and Scope 2 GHG emissions (market-based) (tCO₂eq)	2,079	405	2,483	1,296	291	1,588	-38%	-28%	-36%
Total Scope 1 and Scope 2 GHG emissions (location-based) (tCO₂eq)	1,829	434	2,262	1,323	330	1,654	-28%	-24%	-27%
Total GHG emissions (market-based) (tCO₂eq)	-			38,043			-		
Total GHG emissions (location-based) (tCO₂eq)	-			38,136			-		

In 2025, 309 tonnes of biogenic CO₂ emissions were also generated in the Group's operations.

GHG intensity (Scope 1 and Scope 2). PST metric

GHG intensity per net revenue	2024	2025	Change 2024/2025
Total Scope 1 and 2 GHG emissions (market-based method), divided by net revenue (t CO ₂ e/EUR)	0.00002466	0.00001324	-46%
Total Scope 1 and 2 GHG emissions (local method), divided by net revenue (t CO ₂ e/EUR)	0.00002247	0.00001379	-39%
Total GHG emissions (market-based method), divided by net revenue (t CO ₂ e/EUR)		0.0003174	
Total GHG emissions (domestic method), divided by net revenue (t CO ₂ e/EUR)		0.0003182	

Note: Reconciliation of net revenue (denominator used to calculate GHG emissions intensity as required by Article 53) with the corresponding line item in the financial statements: Consolidated statement of comprehensive income", line "Revenue from contracts with customers".

E1-7 GHG removals and GHG mitigation projects financed through carbon credits

The Group did not carry out or contribute to GHG removals or storage projects in its operations or value chain in 2025.

E1-8 Internal carbon pricing

The Group does not operate carbon pricing systems.

E2 Pollution

MDR – Minimum Disclosure Requirements (MDR-P, MDR-A, MDR-T)

The Group's overarching policy and management system covering all environmental topics is described at the beginning of the section *Environmental Policy*.

Pollution prevention is an integral part of the Group's activities. The Group aims to ensure zero pollutant leakage incidents. Although the Group does not have a separate pollution prevention policy or a time-bound action plan, this area is continuously managed and monitored. Commitments related to pollution management are integrated into the Group's Environmental Policy, which defines key environmental measures and responsibilities.

To minimise potential pollution, prevent environmental incidents and ensure a prompt and effective response, the Group applies the following measures:

- Ongoing risk assessment at construction sites and training for employees (including managers) aimed at preventing hazardous situations and strengthening environmental awareness.
- Strict procedures for the storage and handling of wastewater and chemicals to ensure that hazardous substances do not enter the environment.
- Incident prevention and response plans to ensure effective containment of pollution and minimal impact on people and the environment. Practical drills are conducted at construction sites at least once per year based on selected simulated emergency scenarios.

The Group has identified that certain material pollution aspects in construction activities – noise, dust and dirt – may have a temporary significant impact on communities living near construction sites.

The Group applies the following preventive measures:

- To prevent noise, working hours are limited in accordance with applicable legal requirements, particularly in residential areas. Municipalities are informed about the works carried out in these areas. In some cases, the municipality provides a specific action plan that must be implemented. If such a plan is not provided, works are carried out in compliance with applicable legal requirements.
- To prevent dust, watering is carried out during works on a seasonal basis and in hot weather.
- To prevent dirt, vehicle wheel washing is implemented at construction sites. The Group has also installed an automatic wheel wash system with a closed-loop water cycle, which is rented to construction sites as needed.

In the construction process, communication with local communities is typically coordinated by the client. At the design stage, the client conducts an environmental impact assessment, organises public disclosure of the project, and involves communities in decision-making. During the construction phase, the Group communicates directly with local communities through notices on doors or notice boards. The Group primarily carries out construction works based on client orders. However, when the Group undertakes design activities itself, it responsibly carries out all processes required by law, including environmental impact assessment and public disclosure.

These measures reflect the Group's commitment to conducting its operations responsibly, in line with the highest environmental standards.

E3 Water and marine resources

MDR – Minimum Disclosure Requirements (MDR-P, MDR-A, MDR-T)

The Group's overarching policy and management system covering all environmental topics is described at the beginning of the section *Environmental Policy*. Water conservation is a continuously monitored and managed sustainability area.

During the initial Double Materiality Assessment, the Group identified water consumption as having a material impact; however, this assessment is planned to be reviewed. In accordance with the definition provided in the ETAS standard, water consumption includes water withdrawn into the company's or site's boundaries that is not discharged into the water environment or transferred to a third party during the reporting period.

Depending on the type of project, water demand may be high; however, almost all water used is discharged into municipal wastewater systems together with domestic sewage, where it is treated and returned to the natural water cycle. This means that water is not irreversibly consumed. Water consumption in the direct operations of the Group’s companies is low; for example, it may be used for washing buildings prior to renovation or in concrete production.

E4 Biodiversity

MDR – Minimum Disclosure Requirements (MDR-P, MDR-A, MDR-T)

The Group's overarching policy and management system covering all environmental topics is described at the beginning of the section *Environmental Policy*.

The Group’s direct operations do not have a material impact on biodiversity. To date, there has been no need to establish a separate policy, actions or targets in this area, as most of the Group’s projects are implemented in urban areas where the direct impact on biodiversity is limited.

E5 Circular economy

MDR – Minimum Disclosure Requirements (MDR-P, MDR-A)

The Group's overarching policy and management system covering all environmental topics is described at the beginning of the section *Environmental Policy*.

The Group aims to reduce its environmental impact by responsibly managing all waste generated in its operations. The Group supports and follows the European Union (EU) waste policy, the core principle of which is the waste hierarchy. In line with this principle, priority is given to preventing waste generation, followed by reuse, and only then recycling and recovery.

Construction waste in the Group is sorted at the point of generation. Construction materials suitable for reuse are separated, while those unsuitable are handed over to waste management operators. All waste sorting processes at construction sites are carried out in accordance with applicable requirements, and their compliance is monitored through internal audits. Waste accounting is maintained in the electronic GPAIS system, and the share of sorted waste is calculated at the end of the calendar year.



E5-3 Targets related to resource use and circular economy (MDR-T)

Voluntary waste sorting targets are set each year, defining the minimum share of sorted waste to be achieved.

GPAIS data is used to define and calculate these metrics. The percentage is calculated as the share of sorted waste in the total amount of waste generated (by weight).

Scope of application	Waste sorting targets	Target 2024	Result 2024	Target 2025	Result 2025	Target 2026
Group	Total waste sorting in the Group	Not set	66.4%	≥ 70%	75.28	≥ 70%

In 2025, a significant improvement in waste sorting performance was achieved through the consistent strengthening of waste management practices across the Group. After the Sustainability Department took over the coordination of waste management, a centralised approach and more consistent control were ensured.

An additional in-depth analysis of waste data enabled the identification of problematic sites and targeted areas for improvement. Accordingly, key sorting barriers were addressed, and practical guidance was provided to employees and subcontractors.

Waste sorting performance and good practices were also discussed in internal meetings of PST Group AB (“quality hours”), where insights were shared, sorting instructions were presented, and further measures, including training, were planned.

E5-4 Resource inflows

Resource inflows

The Group’s main resource inflows include various construction and technical materials required for structural works, road construction, finishing works, installation of engineering systems, and other activities. Construction processes require significant volumes of resources; therefore, their efficient management and conservation are an important part of the Group’s operations.

The table below presents the quantities of key raw materials and materials (in various units of measurement) used in the construction and production processes of the Group’s companies, identified as material areas of resource use.

Resource inflows

	2024		2025	
Unit	Quantity	Key resources / materials	Quantity	Key resources / materials
Metal structure manufacturing				
t:	3,350.7	Metal	3,541.8	Metal
Prefabricated panel house manufacturing and construction works				
m ² :	97,367.56	Boards (plywood, OSB, plasterboard)	50,266.44	Boards (plywood, OSB, plasterboard)
units:	430.00	Windows, doors, glazing units	669.00	Windows, doors, glazing units
m ³ :	1,940.27	Timber	1,313.24	Timber, boards
m ² :	16,126.19	Timber	9,565.39	Timber, boards
m ³ :	4,784.44	Insulation materials	3,864.54	Insulation materials
m ² :	7,627.20	Insulation materials	2,405.55	Insulation materials
Manufacture of aluminium profile systems				
Sets:	28.0	Automation systems, door locking mechanisms	0	Automation systems, door locking mechanisms
L:	46.8	Installation materials	0	Installation materials
m.:	2,818.0	Installation materials	0	Installation materials
m ² :	22,821.2	Profiles, fittings, accessories	0	Profiles, fittings, accessories
m ³ :	3.4	Installation materials	0	Installation materials

	2024		2025	
Unit	Quantity	Key resources / materials	Quantity	Key resources / materials
Units:	4,439.0	Installation materials	0	Installation materials
Construction works				
t:	1,749.12	Metal and metal products	1,028.41	Metal and metal products
Units:	34,682.00	Metal and metal products	43,879.00	Metal and metal products
Units:	8,411.00	Reinforced concrete and reinforced concrete products	6,954.00	Reinforced concrete and reinforced concrete products
m ³ :	1.57	Reinforced concrete and reinforced concrete products	14.75	Reinforced concrete and reinforced concrete products
m ³ :	13,375.02	Concrete and concrete products	6,946.57	Concrete and concrete products
t:	149.43	Concrete and concrete products	7,684.66	Concrete and concrete products
t:	2,521.28	Asphalt concrete	5,617.23	Asphalt concrete
Units:	135,951.00	Bricks, blocks	38,054	Bricks, blocks
m ² :	23,930.38	Tiles	16,170.6	Tiles
m ² :	88,347.62	Façade and finishing panels	125,440.7	Façade and finishing panels
m.:	113,809.50	Cables and wires	217,023	Cables and wires
Units:	2,980.4	Electrical equipment (receivers)	6,631	Electrical equipment (receivers)

Note: The Group does not collect data on the weight of purchased products, as they are measured in different units (m, m², units, packages, etc.). Information is provided based on the units of measurement used for procurement. Of the concrete used in operations, approximately 5% in 2024 consisted of reused concrete rubble. In 2025, the amount of materials transferred for direct reuse (not via waste management operators) amounted to 35.67 t (1.2%).

Waste streams generated from operations

The Group generates various waste streams typical of the construction and industrial sectors in the course of its construction, manufacturing, and real estate project activities.

Construction activities generate a wide range of waste streams, including both construction material residues and demolition waste. One of the main waste categories is mineral materials, such as concrete, bricks, and ceramics, arising from the demolition of old structures or the construction of new ones. A significant share of waste also consists of metal structures, including steel, aluminium, and copper, generated during dismantling or the production of construction elements.

In addition, construction sites often accumulate plastic waste, such as pipe offcuts or construction film, as well as glass waste from windows, partitions, or façades. Wood waste is generated from structural elements, pallets, and finishing works residues. Construction activities also generate organic waste, such as plant residues from landscaping works, as well as hazardous waste, including used paints and chemical substances. Another important waste stream is electrical and electronic equipment, as well as dust and cement residues generated during the processing of construction materials.

The waste generated in the Group's operations consists of various materials, a significant share of which can be recycled or reused, contributing to the reduction of environmental impact and their integration into circular economy models.

E5-5 Resource outflows

In 2024, data on waste directed to recycling, recovery, and disposal was collected with significant additional effort – each waste stream was individually verified with waste management operators, and data was checked and reconciled to substantiate the applied waste treatment methods. These data are not obtained automatically from the GPAIS system or other centralised sources.

In 2025, the Group decided not to collect such data manually in the same way, and instead to focus on developing a more reliable and systematic data collection process. As a result, there is insufficient evidence in 2025 to reliably determine the distribution of waste directed to recycling, recovery, or disposal; therefore, this information is not disclosed.

It should be noted that waste management practices within the Group have not materially changed; therefore, the structure of waste directed to recycling and recovery is likely to have remained similar. However, in the absence of sufficient supporting data, this information is not disclosed in the 2025 report.

Waste from operations

	Waste generated in t	
	2024	2025
Total quantity	4,437.39	3,298.37
Hazardous	30.54	5.86
Non-hazardous	4,406.85	3,292.51
Waste directed for recycling*		
Total quantity	589.76	n/a
Hazardous	0	n/a
Non-hazardous	589.76	n/a
Waste directed to other recovery operations		
Total quantity	3,551.16	n/a
Hazardous	0	n/a
Non-hazardous	3,551.16	n/a
Waste directed to disposal (incineration with energy recovery)		
Total quantity	265.93	n/a
Hazardous	0	n/a
Non-hazardous	265.93	n/a
Waste directed for disposal (landfill)		
Total quantity	30.54	n/a
Hazardous	30.54	n/a
Non-hazardous	0	n/a

Notes: The data was obtained from the GPAIS system and waste management operators' certificates. The waste management operator assesses the quality of the waste, weighs it, and records the data in the GPAIS system. No radioactive waste is generated by the Group's operations.

* Verified based on recycling certificates from waste management operators.

Non-recycled waste

	Waste not recycled or otherwise recovered*	
	Total quantity, t	Share, %
2024	296.47	6.7%
2025	n/a	n/a

Notes: *Non-recycled waste – the sum of waste sent for disposal. In this case, in accordance with the definition provided in the ETAS standard, non-recycled waste refers to waste that has been disposed of and not directed to recycling or recovery operations.

EU Taxonomy Regulation KPIs

The European Union (EU) Taxonomy (Regulation (EU) 2020/852 and the delegated acts adopted under it) is a classification system for environmentally sustainable economic activities. Its purpose is to direct private investment towards environmentally sustainable activities and thereby contribute to the achievement of the environmental objectives of the European Green Deal. The system establishes science-based criteria for assessing the sustainability of companies' activities.

Economic activities that fall within the scope of the Taxonomy and meet its criteria may be recognised as environmentally sustainable. A taxonomy-eligible activity is an economic activity that is described in the relevant delegated acts of the Taxonomy Regulation, i.e. officially included in the Taxonomy.

Companies whose turnover, capital expenditure (*CapEx*) and/or operating expenditure (*OpEx*) are associated with activities defined in the Taxonomy are required to assess and disclose the extent to which their activities are aligned with the Taxonomy. An activity is considered taxonomy-aligned if it meets the technical screening criteria, meaning that it makes a substantial contribution to at least one of the six environmental objectives, while at the same time doing no significant harm to the remaining objectives.ES

The EU Taxonomy covers the following environmental objectives:

- CCM - Climate change mitigation
- CCA - Climate change adaptation
- WTR - Sustainable use and protection of water and marine resources
- CE - Transition to a circular economy
- PPC - Pollution prevention and control
- BIO - Protection and restoration of biodiversity and ecosystems

In this report, in accordance with the provisions of the Taxonomy Regulation and the related delegated acts, key performance indicators of the Group's activities and information on the alignment of taxonomy-related activities with the applicable criteria are disclosed.

Identification of Taxonomy-eligible activities and calculation of KPIs

When calculating the KPIs of taxonomy-related activities, it has been ensured that financial amounts related to activities contributing to multiple environmental objectives are counted only once in the numerator of the respective KPI, thereby avoiding double counting.

Turnover (revenue)

The majority of PST Group's turnover is derived from taxonomy-eligible activities. The Group's core activity, construction, is considered taxonomy-eligible and is classified under the category *Construction of new buildings*.

Only revenue generated from the construction of residential and non-residential buildings is included under *Construction of new buildings*. Revenue from other construction activities, such as civil engineering works, is excluded in order to ensure alignment with the definitions set out in the Taxonomy.

In addition to its core construction activities, the Group is also engaged in other taxonomy-eligible activities, such as real estate management and building renovation. These correspond to the Taxonomy activities *Acquisition and ownership of buildings* and *Renovation of existing buildings*.

Specifically, for the activity *Acquisition and ownership of buildings*, rental income generated from the U219 building owned by the Group's subsidiary UAB "Šeškinės projektai" is included.

Taxonomy-eligible turnover has been calculated by mapping specific activities to the corresponding Taxonomy definitions and expressing their share of the Group's total turnover.

Capital expenditure (CapEx)

Based on the assessment of specific acquisitions that can be attributed to taxonomy-eligible activities, in 2025 the Group's subsidiary Hustal UAB acquired a new solar power plant (*Installation, maintenance and repair of renewable energy technologies*).

Acquisitions related to the activity *Acquisition and ownership of buildings* include investments aimed at increasing the investment value of the U219 building managed by UAB "Šeškinės projektai", as well as substantial improvements and modernisation of an administrative building by PST Group AB. A portion of the building improvement expenses was related to the modernisation of the heating system as well as electricity and water supply networks, and was attributed to the Taxonomy activity *Installation, maintenance and repair of energy efficiency equipment*.

Expenses related to the installation of the electrical connection for electric vehicle charging stations were attributed to the Taxonomy activity *Installation, maintenance and repair of electric vehicle charging stations in buildings (and parking spaces adjacent to buildings)*.

The acquisition of passenger vehicles has been attributed to the taxonomy activity *Transport by motorbikes, passenger cars and light commercial vehicles*.

The remaining share of additions to non-current assets (excluding acquisitions related to subsidiaries not engaged in taxonomy-eligible activities) has been allocated to the main taxonomy activities – *Construction of new buildings* and *Renovation of existing buildings*. This allocation was based on revenue proportions, as in the construction sector the same equipment is often used across multiple projects and therefore cannot be directly attributed to a single activity. This approach was considered the most appropriate, taking into account prevailing Taxonomy disclosure practices in the construction sector.

Taxonomy-eligible CapEx has been calculated by mapping investments to the activities defined in the Taxonomy and expressing their proportion of the Group's total capital expenditure. CapEx, as defined under the EU Taxonomy, includes only those additions that meet the definition of the KPI set out in the Taxonomy Regulation. In the Group's case, this corresponds to additions to non-current assets in 2025 and investments made by UAB "Šeškinės projektai" to increase the value of the building.

Operating expenditure (OpEx)

Under the Taxonomy Regulation, operating expenditure (OpEx) is defined as direct non-capitalised costs related to research and development, building renovation measures, short-term leases, maintenance and repair, and other relevant expenditures.

In line with this definition, when calculating total OpEx (the denominator), only maintenance and repair costs and short-term lease expenses have been included. As in the case of CapEx, total OpEx has been allocated across taxonomy activities based on revenue proportions, except for certain costs that were directly attributed to specific taxonomy activities:

- Maintenance and/or repair costs related to the U219 building – attributed to the activity *Acquisition and ownership of buildings*.
Maintenance, repair and/or lease costs of passenger vehicles – attributed to the activity *Transport by motorbikes, passenger cars and light commercial vehicles*.

The taxonomy-eligible OpEx KPI has been calculated as the ratio of operating expenditure associated with activities defined in the Taxonomy to total OpEx, as defined under the Taxonomy.

Assessment of activities under the EU Taxonomy

In accordance with the latest European Commission delegated regulations (EU) 2021/2139 and (EU) 2023/2486, PST Group's activities may contribute to the environmental objectives of climate change

mitigation and the transition to a circular economy. In 2024, in preparation for the implementation of CSRD and Taxonomy requirements, the Group conducted a climate risk assessment. The assessment concluded that physical climate risks are not material to the Group's activities; therefore, the Group's activities are not classified under Taxonomy activities related to climate change adaptation.

The Group carried out an assessment of compliance with Minimum Safeguards based on the European Commission's Platform on Sustainable Finance report *Final Report on Minimum Safeguards (2022)*. In 2025, the Group devoted significant attention to the implementation of these requirements. During the reporting period, a Sustainability Policy was developed and approved, establishing the overall approach to integrating sustainability aspects into the Group's operations, decision-making and strategic planning. The policy was developed in line with the European Sustainability Reporting Standards (ESRS), the European Green Deal, the United Nations Sustainable Development Goals, the OECD Guidelines, and the objectives of the Paris Agreement.

In addition, in 2025 the Group strengthened impact management within its value chain by approving a Supplier Code of Ethics and introducing a supplier questionnaire. These measures aim to embed key principles related to human rights, working conditions and business ethics in the activities of suppliers and subcontractors.

Taking into account the measures implemented and the results of the assessment performed, the Group concluded that it complies with the Minimum Safeguards requirements as at the end of the reporting period.

Taxonomy-aligned activities

In 2025, PST Group determined that part of its activities met the EU Taxonomy criteria (i.e. were Taxonomy-aligned):

- *Acquisition and ownership of buildings*. The U219 building meets the substantial contribution criteria for climate change mitigation, as it holds an Energy Performance Certificate with class A, issued in 2020. Based on the climate risk assessment performed, no significant physical climate risks were identified; therefore, the activity also complies with the DNSH criterion related to climate change adaptation.
- *Installation, maintenance and repair of electric vehicle charging stations in buildings (and parking spaces adjacent to buildings)*. The activity meets the Taxonomy criteria, as in 2025 an electrical connection for electric vehicle charging stations was installed, intended for charging electric vehicles. No significant physical climate risks were identified; therefore, the activity also complies with the DNSH criterion related to climate change adaptation.
- *Installation, maintenance and repair of renewable energy technologies*. The solar power plant acquired through Hustal UAB meets the substantial contribution criteria for climate change mitigation. Based on the climate risk assessment performed, no significant physical climate risks were identified; therefore, the activity also complies with the DNSH criterion related to climate change adaptation.

The results of the assessment are presented below using the standard templates set out in the Taxonomy.

Summary of EU Taxonomy KPIs

Percentage of turnover, capital expenditure (CapEx) and operating expenditure (OpEx) associated with products or services related to taxonomy-eligible and taxonomy-aligned economic activities. Disclosures are presented for the year 2025 (summary KPIs).

Financial year 2025															
KPI	Total	Percentage of taxonomy-eligible activities	Taxonomy-aligned economic activity	Percentage of taxonomy-aligned activities	Environmental objective of taxonomy-aligned economic activity						Percentage of enabling activities	Percentage of transitional activities	Activities considered non-material and therefore not assessed	Taxonomy-aligned activity in the previous financial year (2024)	Percentage of taxonomy-aligned activities in the previous financial year (2024)
					Climate change mitigation	Climate change adaptation	Water	Circular economy	Pollution	Biodiversity					
Text	Thousand Eur	%	Thousand Eur	%	%	%	%	%	%	%	%	%	%	Thousand Eur	%
Turnover (revenue)	119,863	74%	2,259.68	2%	2%	0%	0%	0%	0%	0%	0%	0%	0%	0	0%
CapEx	1,761	65%	141	8%	8%	0%	0%	0%	0%	0%	8%	0%	0%	0	0%
OpEx	3,590	75%	42	1%	1%	0%	0%	0%	0%	0%	0%	0%	0	0%	

Turnover KPI (revenue)

Percentage of turnover associated with taxonomy-eligible and taxonomy-aligned economic activities. Disclosures are presented for the year 2025 (breakdown by activity).

Turnover (revenue)													
Financial year 2025													
Economic activity	Code	Taxonomy-eligible turnover KPI (share of taxonomy-eligible turnover)	Taxonomy-aligned turnover KPI (monetary value of taxonomy-aligned turnover)	Taxonomy-aligned turnover KPI (percentage of taxonomy-aligned turnover)	Environmental objective of taxonomy-aligned economic activity						Enabling activity	Transitional activity	Percentage of taxonomy-eligible activities that are taxonomy-aligned
					Climate change mitigation	Climate change adaptation	Water	Circular economy	Pollution	Biodiversity			
Text	Text	%	Thousand Eur	%	%	%	%	%	%	%	(E, if applicable)	(T, if applicable)	%
Construction of new buildings	CCM 7.1 / CE 3.1	74%	0	0%	0%	-	-	0%	-	-	-	-	0%
Acquisition and ownership of buildings	CCM 7.7	2%	2,259.68	2%	2%	-	-	-	-	-	-	-	100%
Renovation of existing buildings	CCM 7.2 / CE 3.2	7%	0	0%	0%	-	-	0%	-	-	-	-	0%
Sum of alignment by objective					2%	-	-	0%	-	-			
Total KPI (Turnover)		74%	2,259.68	2%							0%	0%	3%

CapEx KPI

Percentage of capital expenditure associated with taxonomy-eligible and taxonomy-aligned economic activities. Disclosures are presented for the year 2025 (breakdown by activity).

CapEx													
Financial year 2025													
Economic activity	Code	Taxonomy-eligible CapEx KPI (share of taxonomy-eligible capital expenditure)	Taxonomy-aligned CapEx KPI (monetary value of taxonomy-aligned capital expenditure)	Taxonomy-aligned CapEx KPI (percentage of taxonomy-aligned capital expenditure)	Environmental objective of taxonomy-aligned economic activity						Enabling activity	Transitional activity	Percentage of taxonomy-eligible activities that are taxonomy-aligned
					Climate change mitigation	Climate change adaptation	Water	Circular economy	Pollution	Biodiversity			
Text	Text	%	Thousand Eur	%	%	%	%	%	%	%	(E, if applicable)	(T, if applicable)	%
Construction of new buildings	CCM 7.1 / CE 3.1	26%	0	0%	0%	-	-	0%	-	-	-	-	0%
Acquisition and ownership of buildings	CCM 7.7	23%	2	0.14%	0.14%	-	-	-	-	-	-	-	1%
Renovation of existing buildings	CCM 7.2 / CE 3.2	2%	0	0%	0%	-	-	0%	-	-	-	-	0%
Installation, maintenance and repair of renewable energy technologies	CCM 7.6	7%	131	7.44%	7.44%	-	-	-	-	-	E	-	100%
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	3%	0	0%	0%	-	-	-	-	-	-	-	0%
Installation, maintenance and repair of energy efficiency equipment	CCM 7.3	4%	0	0%	0%	-	-	-	-	-	E	-	0%
Installation, maintenance and repair of electric vehicle charging stations in buildings (and in parking spaces adjacent to buildings)	CCM 7.4	0%	7	0.4%	0.4%	-	-	-	-	-	E	-	100%
Sum of alignment by objective					8%	-	-	0%	-	-			
Total KPI (CapEx)		65%	141	8%							8%	0%	12%

OpEx KPI

Percentage of operating expenditure associated with taxonomy-eligible and taxonomy-aligned economic activities. Disclosures are presented for the year 2025 (breakdown by activity).

OpEx													
Financial year 2025													
Economic activity	Code	Taxonomy-eligible OpEx KPI (share of taxonomy-eligible operating expenditure)	Taxonomy-aligned OpEx KPI (monetary value of taxonomy-aligned operating expenditure)	Taxonomy-aligned OpEx KPI (percentage of taxonomy-aligned operating expenditure)	Environmental objective of taxonomy-aligned economic activity						Enabling activity	Transitional activity	Percentage of taxonomy-eligible activities that are taxonomy-aligned
					Climate change mitigation	Climate change adaptation	Water	Circular economy	Pollution	Biodiversity			
Text	Text	%	Thousand Eur	%	%	%	%	%	%	%	(E, if applicable)	(T, if applicable)	%
Construction of new buildings	CCM 7.1 / CE 3.1	66%	0	0%	0%	-	-	0%	-	-	-	-	0%
Acquisition and ownership of buildings	CCM 7.7	1%	42	1.2%	1.2%	-	-	-	-	-	-	-	100%
Renovation of existing buildings	CCM 7.2 / CE 3.2	6%	0	0%	0%	-	-	0%	-	-	-	-	0%
Transport by motorbikes, passenger cars and light commercial vehicles	CCM 6.5	2%	0	0%	0%	-	-	-	-	-	-	-	0%
Sum of alignment by objective					1.2%	-	-	0%	-	-			
Total KPI (OpEx)		75%	42	1.2%	1.2%						0%	0%	2%

PST

Social area

Social impacts, risks and opportunities

SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

Own workforce

Material actual and potential negative impacts related to employees arise in the Group's direct operations and are linked to its business model.

The Group operates in the construction sector, where employees face a higher risk of accidents, injuries, and occupational diseases. In response, the Group continuously assesses, monitors, and effectively manages impacts, risks, and opportunities related to occupational health and safety (OHS), aiming to ensure a safe working environment and the highest health and safety standards.

Employee training and development, including the enhancement of both general and specific skills, are an integral part of ensuring OHS, employee well-being, and service quality. This is also a key factor supporting the smooth organisation of the Group's operations and strengthening its competitiveness. The Group's companies consistently invest in employee upskilling and professional development, thereby reinforcing both internal capabilities and long-term market advantage.

Additional employee-related risks are associated with ensuring diversity, equality, and inclusion, as well as fostering an internal sustainability culture. The Group recognises that both topics are highly important to stakeholders; therefore, it actively manages the related risks and seeks to capture opportunities arising from the responsible implementation of relevant initiatives.

Value chain workers

The Group recognises that its business model may have impacts on workers in the value chain. Material direct impacts may arise for subcontractors, who act as operational partners and work directly on construction projects. Subcontractors are subject to the same environmental and occupational health and safety (OHS) policies and requirements as the Group's direct employees.

Indirect negative impacts may occur among upstream value chain workers, including suppliers of construction raw materials and materials, particularly those operating outside the EU. In 2025, the Group strengthened impact management in the value chain by approving a Supplier Code of Ethics and applying a supplier questionnaire aimed at embedding principles of responsible conduct, human rights, and environmental protection. The implementation of these measures marks a consistent step in strengthening the monitoring and management of impacts in the upstream value chain.

Affected communities

Construction activities may cause certain temporary inconveniences to local communities (noise, dust, mud). Although no material direct impacts have been identified, these factors are a typical part of the construction process, which the Group manages responsibly by consistently applying preventive measures and environmental solutions. Further details on the management of these impacts are provided in the section *E2 Pollution*.

Potential risks include community protests, which may lead to project delays and negatively affect the Company's reputation, as well as negative media coverage that may reduce trust in the Company. The Group responds promptly to community complaints, maintains active communication, and applies impact mitigation measures within its sphere of influence.

Users and end users

In the construction sector, the quality of services and structures directly affects end users, their safety, health, and the sustainability of buildings. Poor quality of works or products may lead to safety risks and additional operating and warranty costs, which would negatively affect not only users but also the Group through increased financial costs and reputational risk.

The Group manages these aspects by applying strict quality assurance measures and complying with established standards. Although the current strategy does not include active development of sustainable solutions, this is considered a potential opportunity that could contribute in the future to increased competitiveness, improved reputation, and a broader range of services offered to clients.

Financial impact of social sustainability topics

Social risks and opportunities had no material effect on the Company's financial position, financial performance or cash flows during the reporting period. No risks or opportunities have been identified that would significantly change the carrying amounts of the Group's assets or liabilities in the near term.

S1 Own workforce

The Group companies follow these key policies to manage impacts, risks, and opportunities related to their own workforce:

- Sustainability policy.
- Occupational health and safety policy.
- Violence and harassment prevention policy.
- Equal Opportunities, Diversity and Inclusion, and Human Rights Policy.
- Privacy Policy.
- Group Values Policy.

PST Group has established these policy frameworks, while Group companies implement and adapt them according to the specifics of their operations and individual needs. The implementation and transparency of these policies are continuously monitored. During audits, the Company's internal auditors assess not only the existence of these policies but also their accessibility within the organization.

Employee safety and well-being

The Group places particular emphasis on a safe working environment, considering safety as one of its highest priorities. One of the key objectives is to become a leader in the construction market by ensuring safe workplaces for all employees. The Group has implemented the **Occupational Health and Safety Policy**, has implemented the international OHS management system standard **ISO 45001**, and complies with the relevant procedures of the standard:

- Implementation of environmental protection and occupational health and safety legal and other requirements.
- Emergency preparedness and response.
- Monitoring and measurement.
- Occupational health and safety management.
- Identification of occupational risk factors and risk assessment.
- Management of objectives, targets, and management programmes.
- Design management.
- Procurement and sales.
- Selection of subcontractors.

These procedures ensure continuous identification and assessment of OHS risk factors, the establishment of risk management measures, and control over their implementation.

The Group has established a Sustainability Committee (SC), where employees participate in decision-making related to environmental protection, occupational health and safety, and business ethics.

Occupational health and safety management targets **PST metrics**

Scope of application	Aims and targets	Target 2024	Result 2024	Target 2025	Result 2025	Target 2026
Group	Number of accidents at work (NA)	0	2	0	1	0
	Total Recordable Injury Rate (TRIR)	0	1.78	< 1.6*	1.02	< 1.6*
	Number of potential hazardous events/situations (PHEs)	-10% <i>(2023 m. rezultatas – 79)</i>	173	+10%**	293	+10%**
	Number of potential hazardous events/situations (PHEs)	100%	85%	100%	100%	100%

Notes: *In 2024, the target was set only for own employees, while from 2025 it covers both own employees and subcontractors, including self-employed individuals.

**Although the initial 2024 target aimed to reduce the number of recorded PHEs, practice showed that encouraging higher reporting is more important. Therefore, the Group revised the target – it now aims to increase the number of recorded PHEs, as this reflects growing employee awareness and a strengthening OHS culture. The priority is to train employees to identify and report hazardous situations; over time, as the OHS culture matures, a natural decrease in PHEs is expected.

Methodology for calculating OHS metrics:

- Total Recordable Injury Rate (TRIR): calculated using the same formula as defined in the ETAS standard S1-14 disclosure requirement for the rate of recordable work-related injuries per million hours worked.
- Number of PHEs: Potential hazardous events (situations) identified by the OHS specialist and other responsible OHS managers at the workplace are recorded using the EINPIX platform and the GPJ and incident module of the SAUGA.It platform. The OHS specialist generates reports in the EINPIX platform based on selected categories and time periods, while the SAUGA.It system additionally allows employees and responsible persons to record and monitor PHEs and incidents in real time.
- The implementation of the PHE-related measures is the measures taken to eliminate dangerous situations. In 2024, not all completed measures were recorded in the system, resulting in an achievement rate of 85%; however, in practice, all measures were implemented. Going forward, controls will be strengthened to ensure proper documentation.

Work-related accidents

In 2025, one work-related accident was recorded in a Group company. The incident was related to non-compliance with employee safety requirements during lifting operations and insufficient internal control when performing high-risk tasks.

The Company conducted an investigation and, to prevent similar incidents in the future, implemented additional preventive measures:

- Strengthened on-site instruction for employees performing slinging operations, with particular emphasis on safe working methods and the use of mandatory protective equipment.
- Organized practical training (8 hours) on the safe execution of lifting operations.
- Enhanced continuous monitoring of the work environment and supervisory control, especially for high-risk activities.

OHS training

The Group places primary focus on OHS training, which is an integral part of its Occupational Health and Safety Policy. To ensure the effectiveness and consistency of training, the Group has implemented the ISO 45001 procedure “Personnel Training”, with detailed arrangements set out in internal documents.

The Group takes responsibility for developing employee qualifications and therefore consistently invests time and resources in the organization and delivery of training and educational programmes. Training is carried out in three main areas:

- Development of existing professional competencies;
- Formation of safe behaviour and professional skills;
- Leadership and motivation (development of a sustainability and safety culture).

To continuously strengthen employee competence in OHS, the Group organized both internal and external training in 2025.

The internal training programme includes:

- Theoretical training – covering OHS fundamentals, legal requirements, company rules, and procedures; Focus on hazard identification, safe behaviour principles, use of personal protective equipment, and accident prevention;
- Practical training – focused on specific hazards and activities, including fire and civil safety, use of chemicals, and high-risk works; Evacuation drills and first aid training;
- Periodic knowledge assessments and practical exercises – aimed at refreshing and reinforcing employee knowledge and skills in real or simulated situations.

External training is divided into formal (approved vocational training programmes) and non-formal (programmes tailored by training institutions to company needs).

Company managers and OHS specialists are responsible for overseeing training quality and regularly updating programmes in line with emerging risks and legal requirements. This ensures that every employee is well prepared for their duties and works in a safe environment.



Actions

The Group consistently implements measures related to employee safety, health, and well-being. OHS training is regularly organized, safety equipment is continuously introduced and updated, and systems for incident and hazardous situation investigation and prevention are strengthened. Regular OHS inspections are carried out to identify and eliminate potential hazards in advance.

Employee psychological well-being is also a priority, with various initiatives implemented to reduce stress and improve work–life balance. Employees are provided with psychological support, wellness initiatives are organized, and health check-ups and preventive healthcare programmes are ensured.

Actions implemented in 2025

- To strengthen employee safety and preventive measures, the Group introduced a process for recording incidents and potential hazardous events in 2024 through the **SAUGA.It** and **EINPIX** electronic platforms. These systems enable the prompt identification and mitigation of risks, contributing to a safer working environment.
- In 2024 – 2025, as a result of regular training and the promotion of a safety culture among managers and employees, the identification and reporting of potential hazardous situations increased. This enabled timely detection and elimination of hazardous situations, helping to prevent potential work-related accidents.

Whistleblowing channel

In accordance with the approved procedure for handling information received through PST Group AB's internal whistleblowing channel, a person submitting a report about a violation may do so in the following ways:

- Directly to the designated competent person.
- By sending a report by post to Tinklų g. 7, Panevėžys. When sending by post, the envelope must be marked "TO THE COMPETENT PERSON — PERSONAL".
- By sending a report to the email address **informuok@pst.lt**.
- Electronically via the OHS platform **SAUGA.It**, using the "**Reporting Module**".
- By filling in the form on the PST Group website.

The company's designated competent person responsible for handling reports received through the internal whistleblowing channel is the Sustainability Manager, Vilmantas Fijalkauskas, +370 616 23545. The competent person ensures the confidentiality of any individual who submits information about a violation through the internal channel.

The Group encourages employees to actively contribute to creating a safe working environment and ensures that all reports are handled in accordance with confidentiality and impartiality principles. In 2025, employees actively used the reporting channel – all received reports were reviewed, and identified issues were

addressed through appropriate measures. This confirms the effectiveness of the channel and employees' trust in the reporting process.

Employee training and education

The Group consistently invests in employee learning and development, as this has a material impact on employee well-being and motivation, as well as on service quality and customer satisfaction. Employee development, including the strengthening of both specialized and general skills, is a key factor ensuring the smooth operation of Group companies and long-term competitiveness.

Annual employee development plans are prepared, taking into account the Group's strategic objectives and the competencies required to achieve them. Employees have the opportunity to deepen their knowledge through various training sessions, seminars, and conferences, as well as participate in internal training tailored to specific job requirements. Training programmes are continuously improved to meet market needs and service quality standards.

Actions implemented in 2025

- Continuous training programmes enabled employees to acquire new knowledge and skills required for more efficient work and the implementation of innovations. In 2025, the Group implemented 24 specialized training programmes (internal and external), with 653 managers and employees participating. A total of 3,604 training hours were delivered.
- The Group financed the participation of 50 employees in external professional development courses.
- To strengthen employee competencies in safety and other key areas, the SAUGA.It electronic training platform continues to be developed, ensuring consistent training and knowledge refreshment.
- Competency assessments are ongoing, enabling the identification of individual learning needs and the planning of targeted development measures.

In the near term, the Group plans to further develop its internal training platform, providing employees with continuous learning opportunities. This is expected to ensure higher service quality, greater customer satisfaction, and a stronger company reputation.

Equality, diversity and inclusion

The Group places strong emphasis on diversity, equality, and inclusion, aiming to foster a working environment that takes into account the views and expectations of various stakeholders. Although no material impacts on employees have been identified in this area to date, the Group has identified risks related to the sustainability of its business model, reputation, and increasing expectations regarding equal opportunities.

The Group therefore continuously monitors the situation and takes action to ensure that diversity and inclusion matters are properly managed.

The Group does not discriminate against employees on any non-work-related grounds and evaluates them based on qualifications and competencies, ensuring equal employment and career opportunities. To promote inclusion, each employee's opinion and ideas are heard and valued. No cases of discrimination were recorded in the Group in 2024 – 2025.

The following policies are implemented within the Group:

- Violence and Harassment Prevention Policy;
- Equal Opportunities, Diversity, Inclusion, and Human Rights Policy.

Group companies comply with the anti-discrimination requirements set out in Article 26 of the Labour Code of the Republic of Lithuania, and these principles are also defined in the Violence and Harassment Prevention Policy.

The Group has newly approved the **Equal Opportunities, Diversity, Inclusion, and Human Rights Policy**, which further defines key commitments and their implementation measures.

The policy provides for:

- Ensuring equal opportunities throughout the employee lifecycle (from recruitment to career development and termination of employment), based on objective, work-related criteria.
- Zero tolerance for discrimination, harassment, violence or any unethical behaviour.
- Respect for human rights and the creation of a safe, inclusive working environment.
- Equal opportunities for learning, development, and career advancement based on competencies.
- Fair and transparent principles for remuneration, performance evaluation, and working conditions.
- Measures enabling work–life balance and consideration of individual employee needs.
- The possibility to report violations while ensuring confidentiality and protection against retaliation.

This policy applies to all Group companies, employees, and partners and is regularly reviewed to ensure its relevance and effectiveness.

Employee rights and engagement

The Group ensures employee representation through the Works Council and the OHS Committee, where matters related to working conditions are discussed. To better understand employee expectations and improve the organizational environment, regular employee surveys are conducted on job satisfaction, motivation, safety, and other relevant topics.

 **Targets by 2027**

- **Measure the current level of employee satisfaction and identify key areas for improvement (conduct an employee satisfaction / engagement survey);**
- **Provide at least one training session for employees on diversity, equality, and inclusion.**

Building an internal culture of sustainability

The Group is taking its first steps on the sustainability journey, aiming to strengthen its internal sustainability culture. Although no material impacts on employees have been identified in this area, the Group recognizes long-term risks related to stakeholder expectations and therefore consistently integrates sustainability principles into its operations. The Group aims to create a supportive environment for new ideas and sustainability solutions, ensuring clear communication and accountability.

 **Targets by 2027**

- **Provide at least two training sessions per year for employees related to the achievement of sustainability objectives;**
- **Ensure that at least 70% of employees participate in sustainability training and (or) at least one sustainability initiative per year.**

To achieve these targets, the Group plans to implement sustainability culture initiatives that promote employee awareness and active participation in achieving sustainability objectives. Sustainability initiatives within the Group are defined as various educational, sports, environmental clean-up, and team-building activities aimed at promoting employees' environmental and social engagement and awareness.

Social metrics***S1-6 Characteristics of the Undertaking's Employees*****Breakdown of employees by gender**

In 2025, as in previous years, the majority of the Group's employees were men, reflecting the specifics of the construction sector. Due to the nature of the work, women are less likely to choose roles in technical and construction engineering fields, as well as positions requiring work in outdoor conditions.

Gender	Number of employees*			
	2024		2025	
	PST Group AB	Group	PST Group AB	Group
Men	334	537	315	462
Women	68	92	71	86
Other	0	0	0	0
N/A	0	0	0	0
Total Employees	402	629	386	548

Notes: * Actual number of employees employed under employment contracts at the end of the reporting period (31 December), regardless of full-time equivalent (headcount).

Breakdown of the number of employees by gender and type of employment contract

		Number of employees									
		2024					2025				
		WOMEN	MEN	OTHER (*)	NOT DISCLOSED	TOTAL	WOMEN	MEN	OTHER (*)	NOT DISCLOSED	TOTAL
Number of employees	PST Group AB	68	334	0	0	402	67	304	0	0	371
	Group	92	537	0	0	629	78	445	0	0	523
Number of permanent employees	PST Group AB	67	320	0	0	387	66	290	0	0	356
	Group	90	518	0	0	608	77	430	0	0	507
Number of temporary workers	PST Group AB	1	14	0	0	15	1	14	0	0	15
	Group	2	19	0	0	21	1	15	0	0	16
Number of employees working an unspecified number of hours	Group	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable

Notes: The 2024 figures are presented as the actual number of employees (headcount) at the end of the reporting period. From 2025 onwards, the Group has updated its methodology and reports employee data based on full-time equivalents (FTE). As a result of this methodological improvement, the figures are not directly comparable.

* The "other" category is not applicable, as it is not legally possible to register a third gender in Lithuania.

Employee turnover

	PST Group AB		Group	
	Employees who quit or were made redundant*	Employee Turnover Ratio %**	Employees who quit or were made redundant*	Employee Turnover Ratio %**
2024	114	28%	225	36%
2025	125	32.4%	184	33.6%

* Employees who left voluntarily, were made redundant, retired, or died while performing their duties (headcount).

** Number of resignations or redundancies divided by the total number of employees (head-count) x 100.

S1-9 Diversity metrics

Gender distribution at the top management level

	Gender distribution at the top management level							
	2024				2025			
	PST Group AB		Group		PST Group AB		Group	
	Number of employees	Employee share, %	Number of employees	Employee share, %	Number of employees	Employee share, %	Number of employees	Employee share, %
Men	7	100%	17	94%	7	100%	13	100%
Women	0	0%	1	6%	0	0%	0	0%
Total	7	100%	18	100%	7	100%	13	100%

Note: Definition of top management: CEO and functional directors.

Distribution of employees by age groups

	2024				2025			
	PST Group AB		Group		PST Group AB		Group	
	Number of employees	Employee share, %	Number of employees	Employee share, %	Number of employees	Employee share, %	Number of employees	Employee share, %
Under 30 years old	23	6%	48	8%	26	7%	39	7%
30–50 years old	195	49%	315	50%	198	51%	289	53%
Over 50 years old	184	46%	266	42%	162	42%	220	40%
Total	402	100%	629	100%	386	100%	548	100%

S1-10 Adequate Wages

The Group ensures that all its employees are paid adequate remuneration in accordance with the legal requirements applicable to the Group.

S1-11 Social protection

All Group employees are covered by public social protection schemes in the following cases:

- Sickness – employees receive social insurance benefits.
- Unemployment – the state unemployment social insurance system applies.
- Occupational accidents or acquired disability – social insurance coverage applies in accordance with the applicable legislation.
- Parental leave – employees receive state social benefits for the childcare period.
- Retirement – employees participate in the state pension system.

S1-13 Training and skills development metrics

Average number of hours of training per employee

	2024		2025	
	PST Group AB	Group	PST Group AB	Group
	Average number of hours of training per employee	Average number of hours of training per employee	Average number of hours of training per employee	Average number of hours of training per employee
All employees	5.36	4.61	6.12	6.58
Men	5.7	n/a*	6.83	7.30
Women	3.7	n/a*	2.97	2.67

*Data not available.

In 2025, the average number of training hours per employee increased both at PST Group AB and at the Group level, reflecting a growing focus on employee competence development.

The difference in training hours between men and women is mainly driven by the nature of the activities. In the construction sector, men more often hold technical roles related to production or construction works, which require more frequent and mandatory professional and safety training. Women more often work in administrative or other functions where the need for such training is lower.

The Group does not discriminate on the basis of gender and seeks to ensure equal opportunities for all employees to learn and develop, taking into account their roles, responsibilities, and professional needs.

S1-14 Health and safety metrics

The principles and guidelines of the ISO 45001:2018 OH&S management system are applied to 100% of the Group's hired employees.

Health and safety metrics

	2024	2025
Employees of the company:		
Number of fatalities as a result of work-related injuries and work-related ill health	0	0
Number of recordable work-related accidents	2	1
The total number of hours worked by all employees	1,121,105	977,060
Rate of recordable work-related accidents	1.78	1.02
Number of cases of recordable work-related ill health	0	0
Number of working days lost due to work-related injuries and fatalities from occupational accidents, work-related ill health and fatalities from occupational diseases	19	4
Non-employees classified as own workforce:		
Number of fatalities due to work-related injuries and work-related ill-health among non-employees working at the company's sites	0	0

Health and safety metrics for 2024 – 2025 reflect the Group's consistent and long-term commitment to ensuring a safe working environment. In 2025, a decrease in recordable accidents was observed – their number fell from 2 to 1, while the accident rate decreased from 1.78 to 1.02. In addition, the number of lost working days decreased significantly – from 19 to 4, indicating not only fewer incidents but also lower severity.

These results reflect the effective implementation of safety measures, increasing employee awareness, and a continuous focus on strengthening the occupational safety culture within the organization.

S1-17 Incidents, complaints and severe human rights impacts

In 2025, no complaints were received and no incidents were recorded in the Group related to discrimination or other severe human rights violations.

S2 Value chain workers

The Group ensures that all workers involved in construction projects, regardless of their employment relationship with a Group company, are protected in accordance with the highest occupational health and safety (OHS) standards. The same OH&S policies and requirements apply to subcontractors as to the Group's direct employees, including:

- Compliance with ISO 45001, ensuring adherence to occupational health and safety standards.
- Mandatory OHS training for both direct employees and subcontractors.



- Regular safety inspections of construction sites to reduce the risk of accidents and occupational diseases.
- Regular OHS audits and ad hoc inspections (at least 6 per quarter).

Workers in the value chain can raise concerns and submit complaints through the Group's whistleblowing channel: informuok@pst.lt (and other reporting mechanisms disclosed under ESRS G1-1 in the section *G1 Business ethics*).

The Group cooperates directly with subcontractors and actively monitors their compliance with OHS and social responsibility standards. Non-compliance may lead to review or termination of the contractual relationship.

No specific policies or actions have so far been applied to other value chain workers (e.g., suppliers of construction materials). However, in 2025, the Group strengthened the management of social impacts in the value chain by approving a **Supplier Code of Ethics** and introducing a supplier questionnaire aimed at embedding key principles related to human rights, working conditions, and ethics. Although no actual negative impacts have been identified and no related reports or complaints have been received, the Group acknowledges the sector-specific risk of social impacts, particularly in the upstream value chain outside the EU, and plans to progressively strengthen the assessment and management of this area.

S3 Affected communities

The identified negative impacts on communities are related to pollution, the management of which is discussed in detail in the section *E2 Pollution*. Commitments related to communities are embedded in the Group's Sustainability Policy, which is described in more detail in the section *MDR-P – Sustainability Policy*.

S4 Consumers and end users

The Group sets clear quality standards for its products and services, which are defined in its [Quality Policy](#). These requirements are reviewed and updated annually to ensure they align with operational, client, and market needs.

The Group ensures that all projects implemented meet high quality standards in accordance with **LST EN ISO 9001:2015** requirements. The quality management system includes clear processes, their oversight, and regular audit assessments carried out by an independent certification body.

Quality is directly linked to the Group's competitiveness, customer satisfaction, and financial performance. Poor construction quality may lead to safety risks for end users, warranty costs, and legal disputes. The Group therefore strictly controls material supply, performs systematic quality control, and continuously analyses customer feedback.

To ensure the safety of structures, the Group applies warranty service mechanisms, conducts regular safety inspections, and performs supply chain assessments. The Group prioritises consistent quality control, transparency of construction processes, and clear standards to ensure the safety of both clients and end users.

Other commitments related to consumers and end users are embedded in the Group's Sustainability Policy (see section *MDR-P – Sustainability Policy*).

PST

**Governance
area**

G1 Business ethics

SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

One of the Group's governance-related sustainability topics is sustainability in the supply chain. In the construction sector, where raw material and supply chains can be long and may extend beyond the EU, indirect environmental and social impacts may occur at the early stages of the value chain.

In 2025, the Group strengthened sustainability management in the supply chain by approving the Supplier Code of Ethics and introducing a supplier questionnaire, aimed at embedding key environmental, human rights, labour, and ethical principles. These measures provide a basis for more consistent assessment and management of indirect impacts in the future.

The Group considers the integration of sustainability principles into the supply chain as an opportunity to strengthen resilience to supply chain risks, increase transparency, and enhance long-term competitiveness.

Another important governance area is corporate culture and the prevention of corruption and bribery. Although no material direct impacts have been identified in this area, risks related to corruption and non-compliance remain relevant and require continuous oversight. Any breach of compliance obligations or cases of corruption could result in significant reputational damage, financial penalties, or disruptions to the Group's operations. At the same time, responsible and transparent business practices create opportunities to strengthen the Group's reputation, increase trust among potential clients, and foster a more favourable stakeholder perception.

G1-1 Corporate culture and business conduct policies

Business ethics is an integral part of the Group's operations. The Group aims to create and foster ethical business culture, prevent corruption and bribery and compete fairly. The Group's position and broader approach to business ethics are set out in the PST Group Code of Conduct for employees, suppliers, and company representatives, which is publicly available and accessible to all stakeholders.

The Group actively promotes a culture based on transparency, business ethics principles, and employee well-being. Management regularly reviews aspects of the Group's culture and ensures the practical implementation of ethics policies.

Managers actively contribute to strengthening the culture by promoting employee engagement and responsibility. The Group supports ethical behaviour through training, incentive programmes, and social responsibility initiatives. Employees are provided with the opportunity to report potential violations anonymously through whistleblowing channels, ensuring their protection.

The Group plans to further strengthen its corporate culture by introducing new solutions and improving employee engagement mechanisms.

Whistleblowing channel and whistleblower protection

The Group has implemented internal and external reporting systems to identify, report, and investigate illegal conduct or breaches of business ethics. These systems allow employees, suppliers, and other stakeholders to report anonymously:

- Bribery and corrupt practices.
- Unfair treatment of suppliers and customers.
- Breaches of the Code of Conduct;
- Other violations of business ethics.

In accordance with the approved procedure for handling information received through PST Group AB's internal whistleblowing channel, a person submitting a report about a violation may do so in the following ways:

- Directly to the designated competent person.
- By sending a report by post to Tinklų g. 7, Panevėžys. When sending by post, the envelope must be marked "TO THE COMPETENT PERSON — PERSONAL".
- By sending a report to the email address informuok@pst.lt.
- Electronically via the OHS platform **SAUGA.lt**, using the "**Reporting Module**".
- By filling in the form on the PST Group website.

The company's designated competent person responsible for handling reports received through the internal whistleblowing channel is the Sustainability Manager, Vilmantas Fijalkauskas, +370 616 23545. The competent person ensures the confidentiality of any individual who submits information about a violation through the internal channel.

Received reports are accepted, recorded, and investigated, and whistleblower protection measures are ensured in accordance with the requirements of the Law on the Protection of Whistleblowers of the Republic of Lithuania. The Group does not tolerate any discrimination or negative impacts against individuals who report potential violations.

All reports are reviewed by a specifically appointed responsible officer. Procedures for the prompt, independent, and objective investigation of reported violations are set out in the PST Procedure for Reporting and Handling Information on Violations ("Informacijos apie pažeidimus teikimo ir nagrinėjimo tvarkos aprašas"). If violations are identified, appropriate corrective actions are implemented. The Group continuously reviews and improves these measures to ensure the highest standards of business ethics.

Training on business ethics is provided to staff as required. All employees (100%) are formally familiarized with the procedure for reporting and handling information on violations.

Anti-corruption policy

PST Group and its subsidiaries do not tolerate any form of corruption or its manifestations and ensure transparent operations, fair competition, and ethical business practices. The Group commits to conducting its activities in line with the highest standards of transparency and openness.

In 2025, the Group approved the Anti-Corruption Policy, which establishes zero-tolerance principles for corruption and defines prevention, control, and whistleblowing measures. This policy reflects the main provisions of the United Nations Convention against Corruption.

The Group does not tolerate fraud, extortion, off-the-book accounting, illegal or improperly documented transactions, fictitious expense recording, the use of falsified documents, or any other forms of corruption. Anti-corruption provisions apply to all employees, members of management and supervisory bodies, as well as third parties acting on behalf of the Group.

Corruption risks are mitigated through effective internal control mechanisms designed to identify potential threats. Group companies continuously monitor operations and improve processes to ensure transparency. The Group does not engage in political influence activities and does not finance political parties, their representatives, candidates, or election campaigns.

The Group always cooperates with the authorities and is ready to provide all the necessary information.

No material breaches of laws and regulations were identified in 2024 – 2025. No fines were imposed for non-compliance with legal requirements. The Group complies with all applicable laws and regulations.

The Group has not identified specific positions with a higher risk of corruption and bribery.

G1-2 Management of relationships with suppliers

PST Group and its subsidiaries ensure that all procurement is carried out in accordance with the principles of equal treatment, non-discrimination, transparency, mutual recognition, proportionality, confidentiality, and impartiality, while ensuring the rational use of funds. Suppliers are selected based on the most economically advantageous offer or the lowest price, ensuring equal and non-discriminatory conditions for all suppliers. In the subcontractor selection process, the Group assesses their qualifications, with particular attention to compliance with environmental and occupational health and safety (OHS) legislation, as well as the integrity of subcontractors.

The Group aims to settle payments with all suppliers on time, in accordance with agreed terms, without discriminating against small and medium-sized enterprises (SMEs).

The Group manages supplier relationships to ensure transparency and responsible business practices throughout the value chain. In 2025, the Group strengthened supply chain sustainability management by approving the Supplier Code of Ethics and introducing a supplier questionnaire to assess compliance with key social, environmental, and business ethics principles. These measures provide a basis for more consistent monitoring of supply chain impacts and for setting future targets.



Targets by 2027

- **Ensure that at least 50% of suppliers and (or) subcontractors declare compliance with the Supplier Code of Ethics and submit completed environmental and social questionnaires.**

G1-4 Incidents of corruption or bribery

No cases of corruption or bribery were identified in the Group during the period 2024 – 2025. The Group did not receive any convictions for violations of anti-corruption and anti-bribery laws.

G1-6 Payment practices

The Group aims to make payments to suppliers in accordance with agreed terms; however, actual payment periods may vary due to various circumstances, such as settlements from end customers or additional, sometimes informal, agreements. The Group does not discriminate against suppliers, including small and medium-sized enterprises (SMEs).

There are no standard average payment terms – they may range from advance payments to up to 90 days from the date of receipt of the construction invoice. Group companies aim to align payment terms that are acceptable to both customers and suppliers.

There are currently no ongoing legal proceedings related to late payments.

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ESRS datapoints required by other legislation

List of data points in cross-cutting and topical standards that derive from other EU legislation

This appendix is an integral part of ESRS 2. The table below provides the list of ESRS and topical ESRS datapoints required by other EU legislation

Disclosure requirement and related data point	Reference to TFIAR ³	Reference to Pillar 3 ⁴	Reference to the Benchmarks Regulation ⁵	Reference to the European Climate Law ⁶	Page
ESRS 2 GOV-1 Gender balance on the management body (Article 21(d))	Annex I, Table 1, metric 13		Annex II to Commission Delegated Regulation (EU) 2020/1816 ⁷		4
ESRS 2 GOV-1 Percentage of independent board members (Article 21(e))			Annex II to Commission Delegated Regulation (EU) 2020/1816		4
ESRS 2 GOV-4 Statement on due diligence (Article 30)	Annex I, Table 3, metric 10				6
ESRS 2 SBM-1 Involvement in activities related to fossil fuels (Article 40(d)(i))	Annex I, Table 1, metric 4	Article 449a of Regulation (EU) No 575/2013; Table 1 of Commission Implementing Regulation (EU) 2022/2453 ⁸ : Qualitative information on environmental risks and Table 2: Qualitative information on social risks	Annex II to Commission Delegated Regulation (EU) 2020/1816		Not applicable

³ Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on disclosure of sustainability-related information in the financial services sector (the Regulation on disclosure of sustainability-related financial information) (OJ L 317, 9.12.2019, p. 1)

⁴ Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012 (Capital Requirements Regulation (CRR)) (OJ L 176, 27.6.2013, p. 1).

⁵ Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or for measuring the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EU and Regulation (EU) No 596/2014 (Benchmarks Regulation) (OJ L 171, 29.6.2016, p. 1).

⁶ Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing a framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) No 2018/1999 (European Climate Law) (OJ L 243, 9.7.2021, p. 1).

⁷ Commission Delegated Regulation (EU) 2020/1816 of 17 July 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council by specifying the explanation to be provided in the benchmark statement on how environmental, social and governance (ESG) factors are reflected in each benchmark provided and published (OJ L 406, 3.12.2020, p. 1).

⁸ Commission Implementing Regulation (EU) 2022/2453 of 30 November 2022 amending the implementing technical standards laid down in Implementing Regulation (EU) 2021/637 as regards disclosures of environmental, social and governance risks (OJ L 324, 19.12.2022, p. 1).

Disclosure requirement and related data point	Reference to TFIAR ³	Reference to Pillar 3 ⁴	Reference to the Benchmarks Regulation ⁵	Reference to the European Climate Law ⁶	Page
ESRS 2 SBM-1 Involvement in activities related to the production of chemicals (Article 40(d)(ii))	Annex I, Table 2, metric 9		Annex II to Commission Delegated Regulation (EU) 2020/1816		Not applicable
ESRS 2 SBM-1 Involvement in activities related to controversial weapons Article 40(d)(iii)	Annex I, Table 1, metric 14		Article 12(1) of Delegated Regulation (EU) 2020/1818 ⁹ , Annex II to Delegated Regulation (EU) 2020/1816		Not applicable
ESRS 2 SBM-1 Involvement in activities related to tobacco production and cultivation (Article 40(d)(iv))			Article 12(1) of Delegated Regulation (EU) 2020/1818, Annex II to Delegated Regulation (EU) 2020/1816		Not applicable
E1-1 ESRS Plan for the transition to a climate-neutral economy by 2050 (Article 14)				Article 2(1) of Regulation (EU) 2021/1119	30
E1-1 ESRS Undertakings not subject to EU Paris-aligned Benchmarks (Article 16(g))		Article 449a Regulation (EU) No 575/2013; Template 1 of Commission Implementing Regulation (EU) 2022/2453: Banking book. Metrics on potential climate change transition risks. Credit quality of exposures by sector, emissions and residual maturity	Article 12(1)(d) to (g) and (g) and Article 12(2) of Delegated Regulation (EU) 2020/1818		Not applicable
E1-4 ESRS GHG emission reduction targets	Article 34, Annex I, Table 2, metric 4	Article 449a Regulation (EU) No 575/2013; Template 3 of Commission Implementing Regulation (EU) 2022/2453: Banking book. Metrics on potential climate change transition risks. Alignment metrics	Article 6 of Delegated Regulation (EU) 2020/1818		31
E1-5 ESRS Consumption of energy from fossil sources, disaggregated by	Annex I, Table 1, metric 5 and Table 2, metric 5				31

⁹ Commission Delegated Regulation (EU) 2020/1818 of 17 July 2020 supplementing Regulation (EU) 2016/1011 of the European Parliament and of the Council with regard to minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks (OJ L 406, 3.12.2020, p. 17).

Disclosure requirement and related data point	Reference to TFIAR ³	Reference to Pillar 3 ⁴	Reference to the Benchmarks Regulation ⁵	Reference to the European Climate Law ⁶	Page
source (for high climate impact sectors only) (Article 38)					
E1-5 ESRS Energy consumption and mix (Article 37)	Annex I, Table 1, metric 5				31
E1-5 ESRS Energy consumption intensity related to activities in high climate impact sectors (Articles 40–43)	Annex I, Table 1, metric 6				31
E1-6 ESRS Gross Scope 1, 2 and 3 GHG emissions and total GHG emissions (Article 44)	Annex I, Table 1, metrics 1 and 2	Article 449a; Regulation (EU) No 575/2013; Template 1 of Commission Implementing Regulation (EU) 2022/2453: Banking book. Metrics on potential climate change transition risks. Credit quality of exposures by sector, emissions and residual maturity	Articles 5(1), 6 and 8(1) of Delegated Regulation (EU) 2020/1818		32
E1-6 ESRS Energy consumption intensity of total GHG emissions (Articles 53–55)	Annex I, Table 1, metric 3	Article 449a of Regulation (EU) No 575/2013; Template 3 of Commission Implementing Regulation (EU) 2022/2453: Banking book. Metrics on potential climate change transition risks. Alignment metrics	Article 8(1) of Delegated Regulation (EU) 2020/1818		32
E1-7 ESRS GHG removals and carbon credits (Article 56)				Article 2(1) of Regulation (EU) 2021/1119	34
E1-9 ESRS Position of the benchmark portfolio with regard to climate-related physical risk (Article 66)			Annex II to Delegated Regulation (EU) 2020/1818, Annex II to Delegated Regulation (EU) 2020/1816		Disclosure requirement subject to phased-in application
E1-9 ESRS Breakdown of monetary amounts by acute and chronic physical risk (Article 66(a)) E1-9 ESRS Location of significant assets exposed to material physical risk (Article 66(c))		Article 449a of Regulation (EU) No 575/2013; Articles 46 and 47 of Commission Implementing Regulation (EU) 2022/2453; Template 5. Banking book. Metrics on potential climate-related physical risks.			Disclosure requirement subject to phased-in application

Disclosure requirement and related data point	Reference to TFIAR ³	Reference to Pillar 3 ⁴	Reference to the Benchmarks Regulation ⁵	Reference to the European Climate Law ⁶	Page
		Exposures to physical risk.			
E1-9 ESRS Breakdown of the carrying amount of the undertaking's real estate assets by energy efficiency class (Article 67(c))		Article 449a of Regulation (EU) No 575/2013; Article 34 of Commission Implementing Regulation (EU) 2022/2453; Template 2. Banking book. Metrics on potential climate change transition risks. Loans secured by real estate. Energy efficiency of collateral			Disclosure requirement subject to phased-in application
E1-9 ESRS Extent of portfolio positions with regard to climate-related opportunities (Article 69)			Annex II to Commission Delegated Regulation (EU) 2020/1818		Disclosure requirement subject to phased-in application
E2-4 ESRS Amount of each pollutant listed in Annex II to the E-PRTR Regulation emitted to air, water and soil (Article 28)	Annex I, Table 1, metric 8, Annex I, Table 2, metric 2, Annex I, Table 2, metric 1, Annex I, Table 2, metric 3				Not applicable
E3-1 ESRS Water and marine resources (Article 9)	Annex I, Table 2, metric 7				Not applicable
E3-1 ESRS Adopted policy (Article 13)	Annex I, Table 2, metric 8				Not applicable
E3-1 ESRS Sustainable oceans and seas (Article 14)	Annex I, Table 2, metric 12				Not applicable
E3-4 ESRS Total quantity of water recycled and reused Article 28(c)	Annex I, Table 2, metric 6.2				Not applicable
E3-4 ESRS Total water consumption (m ³) per net revenue from own operations (Article 29)	Annex I, Table 2, metric 6.1				Not applicable
ESRS 2 IRO-1 - E4 (Article 16(a)(i))	Annex I, Table 1, metric 7				17
ESRS 2 IRO-1 - E4 (Article 16(b))	Annex I, Table 2, metric 10				17
ESRS 2 IRO-1 - E4 (Article 16(c))	Annex I, Table 2, metric 14				17

Disclosure requirement and related data point	Reference to TFIAR ³	Reference to Pillar 3 ⁴	Reference to the Benchmarks Regulation ⁵	Reference to the European Climate Law ⁶	Page
E4-2 ESRS Sustainable land use and (or) agricultural practices or policy (Article 24(b))	Annex I, Table 2, metric 11				Not applicable
E4-2 ESRS Sustainable use of oceans and (or) seas practices or policy (Article 24(c))	Annex I, Table 2, metric 12				Not applicable
E4-2 ESRS Policy to address deforestation (Article 24(d))	Annex I, Table 2, metric 15				Not applicable
E5-5 ESRS Non-recycled waste (Article 37(d))	Annex I, Table 2, metric 13				39
E5-5 ESRS Hazardous waste and radioactive waste (Article 39)	Annex I, Table 1, metric 9				39
ESRS 2 - SBM3 - S1 Risk of incidents related to forced labour (Article 14(f))	Annex I, Table 3, metric 13				48
ESRS 2 - SBM3 - S1 Risk of incidents related to child labour (Article 14(g))	Annex I, Table 3, metric 12				48
S1-1 ESRS Human rights policy commitments (Article 20)	Annex I, Table 3, metric 9 and Table 1, metric 11				Disclosure requirement subject to phased-in application
S1-1 ESRS Due diligence policy covering aspects included in the core International Labour Organization Conventions No. 1–8 (Article 21)			Annex II to Commission Delegated Regulation (EU) 2020/1816		Disclosure requirement subject to phased-in application
S1-1 ESRS Processes and measures for the prevention of human trafficking (Article 22).	Annex I, Table 3, metric 11				Disclosure requirement subject to phased-in application
S1-1 ESRS Policy or management system for the prevention of occupational accidents (Article 23).	Annex I, Table 3, metric 1				Disclosure requirement subject to phased-in application
S1-3 ESRS	Annex I, Table 3, metric 5				Disclosure requirement subject to

Disclosure requirement and related data point	Reference to TFIAR ³	Reference to Pillar 3 ⁴	Reference to the Benchmarks Regulation ⁵	Reference to the European Climate Law ⁶	Page
Grievance submission and (or) grievance handling mechanism (Article 32(c)).					phased-in application
S1-14 ESRS Number and rate of fatalities and work-related accidents (Article 88(b) and (c)).	Annex I, Table 3, metric 2		Annex II to Commission Delegated Regulation (EU) 2020/1816		59
S1-14 ESRS Number of working days lost due to injuries, accidents, fatalities or illnesses (Article 88(e)).	Annex I, Table 3, metric 3				59
S1-16 ESRS Unadjusted gender pay gap (Article 97(a)).	Annex I, Table 1, metric 12		Annex II to Commission Delegated Regulation (EU) 2020/1816		Disclosure requirement subject to phased-in application
S1-16 ESRS Excessive CEO pay ratio (Article 97(b)).	Annex I, Table 3, metric 8				Disclosure requirement subject to phased-in application
S1-17 ESRS Cases of discrimination (Article 103(a)).	Annex I, Table 3, metric 7				59
S1-17 ESRS Non-compliance with the UN Guiding Principles on Business and Human Rights and OECD Guidelines for Multinational Enterprises (Article 104(a)).	Annex I, Table 1, metric 10 and Table 3, metric 14		Annex II to Delegated Regulation (EU) 2020/1816, Article 12(1) of Delegated Regulation (EU) 2020/1818		59
ESRS 2 - SBM3 - S2 Significant risk of child labour or forced labour in the value chain (Article 11(b)).	Annex I, Table 3, metrics 12 and 13				48
S2-1 ESRS Human rights policy commitments (Article 17)	Annex I, Table 3, metric 9 and Table 1, metric 11				Disclosure requirement subject to phased-in application
S2-1 ESRS Policy related to value chain workers (Article 18)	Annex I, Table 3, metrics 11 and 4				Disclosure requirement subject to phased-in application
S2-1 ESRS Non-compliance with the UN Guiding Principles on Business and Human Rights and OECD Guidelines for Multinational Enterprises (Article 19)	Annex I, Table 1, metric 10		Annex II to Delegated Regulation (EU) 2020/1816, Article 12(1) of Delegated Regulation (EU) 2020/1818		Disclosure requirement subject to phased-in application

Disclosure requirement and related data point	Reference to TFIAR ³	Reference to Pillar 3 ⁴	Reference to the Benchmarks Regulation ⁵	Reference to the European Climate Law ⁶	Page
S2-1 ESRS Due diligence policy covering aspects included in the core International Labour Organization Conventions No. 1–8 (Article 19)			Annex II to Commission Delegated Regulation (EU) 2020/1816		Disclosure requirement subject to phased-in application
S2-4 ESRS Human rights issues and incidents related to the upstream and downstream value chain (Article 36).	Annex I, Table 3, metric 14				Disclosure requirement subject to phased-in application
S3-1 ESRS Human rights policy commitments (Article 16)	Annex I, Table 3, metric 9 and Table 1, metric 11				Disclosure requirement subject to phased-in application
S3-1 ESRS Non-compliance with the UN Guiding Principles on Business and Human Rights, International Labour Organization principles and OECD Guidelines for Multinational Enterprises (Article 17).	Annex I, Table 1, metric 10		Annex II to Delegated Regulation (EU) 2020/1816, Article 12(1) of Delegated Regulation (EU) 2020/1818		Disclosure requirement subject to phased-in application
S3-4 ESRS Human rights issues and incidents (Article 36).	Annex I, Table 3, metric 14				Disclosure requirement subject to phased-in application
S4-1 ESRS Policy related to consumers and end-users (Article 16).	Annex I, Table 3, metric 9 and Table 1, metric 11				Disclosure requirement subject to phased-in application
S4-1 ESRS Non-compliance with the UN Guiding Principles on Business and Human Rights and OECD Guidelines for Multinational Enterprises (Article 17).	Annex I, Table 1, metric 10		Annex II to Delegated Regulation (EU) 2020/1816, Article 12(1) of Delegated Regulation (EU) 2020/1818		Disclosure requirement subject to phased-in application
S4-4 ESRS Human rights issues and incidents (Article 35).	Annex I, Table 3, metric 14				Disclosure requirement subject to phased-in application
G1-1 ESRS United Nations Convention against Corruption (Article 10(b)).	Annex I, Table 3, metric 15				62
G1-1 ESRS Whistleblower protection (Article 10(d)).	Annex I, Table 3, metric 6				62

Disclosure requirement and related data point	Reference to TFIAR ³	Reference to Pillar 3 ⁴	Reference to the Benchmarks Regulation ⁵	Reference to the European Climate Law ⁶	Page
G1-4 ESRS Fines for violations of anti-corruption and anti-bribery laws (Article 24(a)).	Annex I, Table 3, metric 17		Annex II to Delegated Regulation (EU) 2020/1816		65
G1-4 ESRS Anti-corruption and anti-bribery standards (Article 24(b)).	Annex I, Table 3, metric 16				65

Key elements of the due diligence (GOV-4)

KEY ELEMENTS OF THE DUE DILIGENCE	PARTS OF THE SUSTAINABILITY REPORT
a) Integrating due diligence into governance, strategy and business model	GOV-1 GOV-2 GOV-3 SBM-3
b) Involvement of affected stakeholders in all key stages of due diligence	GOV-2 SBM-2 IRO-1
c) Identification and assessment of negative impacts	SBM-3 IRO-1 MDR-P
d) Taking action to address these negative impacts	MDR-A
e) Monitoring and communicating the effectiveness of these efforts	SBM-1 MDR-T