



## ENVIRONMENTAL STATEMENT

Declaration on compliance with the applicable requirements related to the environment and environmental behavior of INGSTEEL, s.r.o.

# 2023



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## 1. ABOUT THE COMPANY

### 1.1 Basic data

Business name: INGSTEEL, spol. s r.o.  
Head Office: Tomášikova 17, 820 09 Bratislava  
Company ID: 17,320,429  
VAT ID: SK 2020318322  
E-mail: ingsteel@ingsteel.sk  
Phone: +421 2 48 26 91 11-2

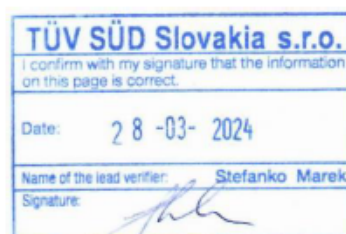
Extract from the commercial register of the Bratislava I District Court, section s.r.o.  
insert no. 1220/B

Managing directors of the company: Ing. Ivan Bezák, PhD., Ing. Daša Slezáková

### 1.2 Business activities

INGSTEEL offers comprehensive services from the preparation of investment plans to the implementation of "turnkey" constructions. The qualified team of our employees and modern machinery allow us to constantly improve technological procedures, thus shortening the construction time while maintaining the above-standard quality of the work carried out.

The company has introduced and uses an integrated management system according to the STN EN ISO 9001:2015 standard, a safety and health management system at work according to the STN EN 45001:2018 standard, and an environmental management system according to the STN ISO 14 001:2015 standard and Regulation (EC) no. 1221/2009 of the European Parliament and the Council (EC) on the voluntary participation by organizations in a Community eco-management and audit scheme, Commission Regulation (EU) 2017/1505 amending Annexes I, II and III to Regulation (EC) No 1221/2009 of the European Parliament and of the Council on the voluntary participation by organizations in a Community eco-management and audit scheme and Commission Regulation (EU) 2018/2026 amending Annex IV to Regulation (EC) No 1221/2009 of the European Parliament and of the Council on the




voluntary participation by organizations in a Community eco-management and audit scheme for the following activities:

- Preparatory work for the execution of construction works
- Implementation of constructions and their changes
- Production and assembly of metal structures and metal profiles
- Engineering, construction pricing and design

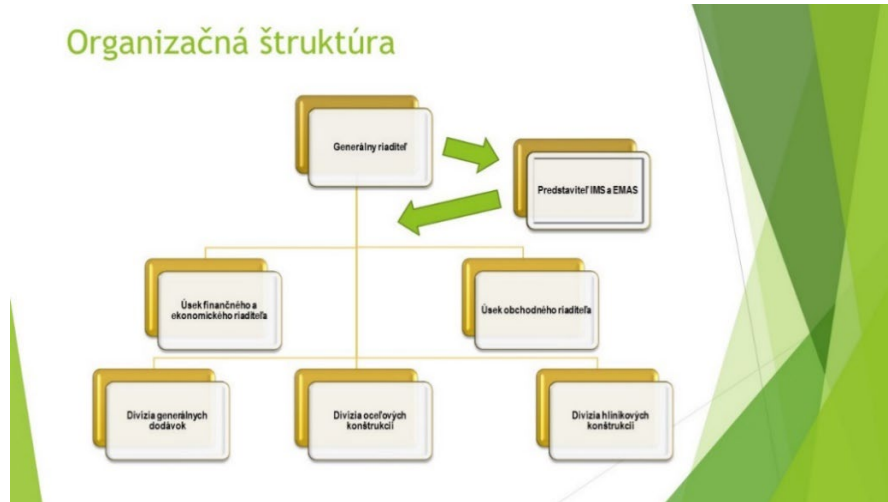
**Vision and mission:** INGSTEEL is fully aware of its social responsibility and therefore takes care of environmental protection and compliance with ethical principles in business in every activity. Through innovative solutions and constant technical development, it strives to create lasting values so that all completed constructions benefit society and leave a legacy for future generations. INGSTEEL will continue to focus on the implementation of constructions, where it will be able to fully use its own design and production capacities. In year 2023 company Ingsteel finalized several projects. Division of steel structures executed Cycling bridge above the river Laborec in Humenne in Slovakia, cycling bridge Hušták above the highway R3 in Banská Bystrica, cycling bridge above river Váh in Považský Chlmec. Division of the turnkey projects executed as general contractor production Hall H7 for Volkswagen in Bratislava, also project of extension and renovation of the part B and C of the Oncological Institute Hospital of Saint Elizabeth, in Bratislava. Division of aluminium structures executed facades for projects The MILL and Office building ORGANICA in Ostrava in Czech Republic and also other projects.

### 1.3 Scope of registration in the EMAS scheme

In 2020, the company's management decided on the active involvement of INGSTEEL, s.r.o. in the voluntary participation of the organization in the Community scheme for environmental management and audit (EMAS) according to the Regulation of the European Parliament and the Council (EC) no. 1221/2009. The EMAS scheme was implemented by INGSTEEL within the entire organizational structure, all its divisions, in all its operations and on construction sites or parts of constructions implemented by the company.

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The organizational structure of the company is shown in the following figure:



Scope of registration in the EMAS scheme in terms of sites:

- Head Office (administration):  
Tomášikova 17, 820 09 Bratislava
- Production area of steel structures:  
Trstín 47, 919 05 Trstín
- Production area of aluminum structures:  
Šamorínska cesta 10, 903 01 Senec
- Constructions or parts of constructions carried out by our company in premises according to the customer's specifications



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Overview of activities and relevant SK NACE codes that are subject to environmental verification:

- 41.20 Construction of residential and non-residential buildings
- 42.11 Construction of roads and highways
- 42.11 Construction of bridges and tunnels
- 42.99 Construction of other engineering structures not included elsewhere
- 43.99 Other specialized construction works not included elsewhere
- 25.11 Production of metal structures
- 71.12 Engineering activities and related technical advice

General Supplies Division 41.20, 42.11, 42.13, 42.99, 43.99, 71.12	<b>PO</b>	Steel Structures Division 41.20, 42.11, 42.13, 42.99, 43.99, 25.11, 71.12	<b>NT</b>	Aluminum Structures Division 41.20, 42.99, 43.99, 25.11, 71.12
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## 2.1 Environmental policy

The environmental policy represents the company's commitment to environmental protection and continuous improvement of the environmental management system with the aim of improving the environmental behavior of the organization.

The environmental policy is documented and made available to all stakeholders: employees via the intranet and the public via the company's website.



## Sustainable environmental policy

The company INGSTEEL considers a sustainable environmental policy to be one of its priority objectives. The basic tool for managing and ensuring the environment is implementing and using the environmental management system according to the ISO 14001: 2015 standard and the EMAS environmental scheme.

Environmental policy principles:

1. To build, maintain and continually improve an environmental management system in compliance with international standards.
2. To comply with current environmental legal standards, regulations and other requirements in carrying out its own activities.
3. Regularly determine and re-evaluate the long-term and short-term goals of the company in accordance with the requirements of the environmental management system.
4. To reduce and sort waste volumes prioritizing recovery over disposal.
5. To protect the environment by reducing emissions to air, reducing the volume of pollutants in water and soil in the process of construction, operation and maintenance.
6. To orient development to such processes and products that reduce negative environmental impacts.
7. To promote the efficient use of raw stock, materials and energy, thus reducing costs.
8. To enable employees to evaluate non-returnable packaging in the household free of charge in accordance with applicable legislation.
9. To create conditions for the separation of waste generated during individual activities of the company.
10. To create suitable conditions for soil and groundwater protection during construction activities.
11. To prevent environmental pollution and accidents by prevention.
12. To reduce emissions and negative impacts on the environment by modernization machinery.
13. To increase the environmental awareness of employees as well as employees of subcontractors through regular training.
14. Actively transfer the environmental policy principles of the company INGSTEEL to the contractual partners when closing business cases.

The basic strategic goals stated in this statement are further specified in internal documents of the company INGSTEEL and the fulfilment of their goals is binding for all employees, as well as employees of subcontracting organizations.

The company INGSTEEL will ensure that the environmental policy and management system is understood, implemented, and adhered to at all levels of our organization so that the necessary information, criteria, and objectives are available to all stakeholders, in particular, but not limited to, employees, suppliers, customers, and the public. Any suggestions can be sent by any interested party to the address [ingsteel@ingsteel.sk](mailto:ingsteel@ingsteel.sk).

In Bratislava 9.1.2024

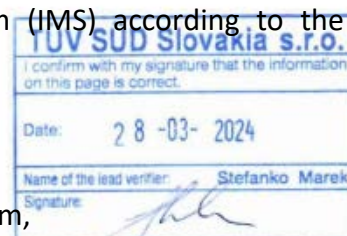


Ing. Ivan Bezák Ph.D.  
General Director

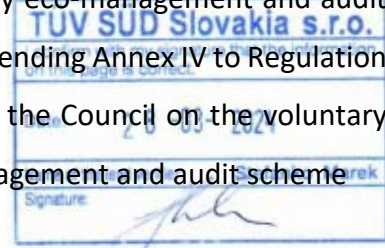
## 2.2 Environmental management

INGSTEEL has implemented an integrated management system (IMS) according to the standards:

- STN EN ISO 9001:2015 Quality management system,
- STN EN ISO 14001:2015 Environmental management system,
- STN EN 45001:2018 occupational health and safety management system,
- Regulation (EC) no. 1221/2009 of the European Parliament and the Council (EC) on the voluntary participation by organizations in a Community eco-management and audit scheme, Commission Regulation (EU) 2017/1505 amending Annexes I, II and III to



Regulation (EC) No 1221/2009 of the European Parliament and of the Council on the voluntary participation by organizations in a Community eco-management and audit scheme and Commission Regulation (EU) 2018/2026 amending Annex IV to Regulation (EC) No 1221/2009 of the European Parliament and of the Council on the voluntary participation by organizations in a Community eco-management and audit scheme



**CERTIFICATE OF REGISTRATION**  
Number 11/2021

**INGSTEEL, spol. s r.o.**

Tomášikova 17, 820 09 Bratislava

has complied with the requirements of Regulation (EC) No. 1221/2009 of the European Parliament and of the Council on the voluntary participation by organisations in the European Community eco-management and audit scheme (EMAS), is registered in the EMAS Register, and has the right to use the EMAS logo.

Registration number: SK – 000049



Classification code of economic activities of the organisation:  
**NACE 41.20, 42.11, 42.13, 42.99, 43.99, 25.11, 71.12**  
Act No. 351/2012 Coll. on Environmental verification and registration of organisations in the European Union eco-management and audit scheme, and on the amendment of certain laws, applies to the registration. The validity of this certificate is limited by the period of validity of the verified environmental declaration until **6 May 2024**. The certificate is only valid with its annex.

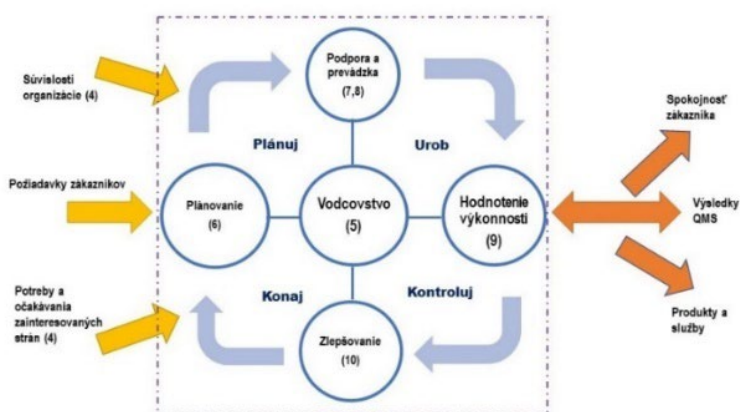


Mgr. Michal Maco  
Managing Director of the  
Slovak Environment Agency  
Banská Bystrica, 7 June 2021



The integrated management system is regularly checked by an independent accredited certification body - the company QSCert, spol. s r.o., the company's participation in the Community scheme for environmental management and audit is regularly checked by an independent accredited certification body - the company TÜV SÜD Slovakia s.r.o.

The company uses the PDCA process approach in its management (Plan-Do-Check-Act) PLAN-DO-CHECK-ACT.



### 3. ENVIRONMENTAL ASPECTS

INGSTEEL, spol. s r.o. has a procedure for identifying, monitoring and evaluating environmental aspects within the internal directive IS-EMS-06 Environmental aspects and environmental management. Environmental aspects have been determined according to individual activities for each operation separately, while taking into account the life cycle of construction activities, positive and negative impact on the environment. The representative for the integrated management system ensures the annual review and updating of the register of environmental aspects and checks its compliance with the applicable legislation and regulations of the relevant government authorities.



Environmental aspects are distinguished into:

- direct – they are the result of the company's own activities
- indirect - they come from the activities of the organization's contractors during the implementation of construction contracts



The assessment of environmental aspects is carried out in the company based on four criteria, namely:

A1 - Assessment of the seriousness, possible threat to the environment by a given environmental aspect and its impact on activities in the company with regard to legal regulations (legislation). The criterion can reach a values of 1-significant severity, 2-significant minor severity, 3-significant environmental severity.

A2 - Assessment of the real impact of the environmental aspect on the environment. The criterion take the values 1-no or very low impact, 2-impact is permanent but low, 3-impact is permanent within a specified limit.

A3 – Assessment of the possible impact of the environmental aspect on the environment in terms of frequency / probability of occurrence. The criterion can reach the values 1- there

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is no impact, the occurrence of an impact is almost excluded , 2- the occurrence of an impact may occur, 3- the impact is high, the impact may have already occurred /disaster, fire/.

A4 – Nature and volume of complaints from stakeholders

Each of the listed criteria can reach a value of 1-3, where a value of 1 means *compliance* with legal requirements in all operational states, a value of 2 means that *compliance is not always observed* and in exceptional operating states, and a value of 3 means *non-compliance* with legal requirements. By summing the resulting values, we get the overall assessment of the environmental aspect.

Environmental aspects from the point of view of the overall assessment of environmental impacts are classified into three levels:

 VVEA – very significant environmental aspect – value above 9

 VEA – significant environmental aspect – value 6 - 8

 MVE – less significant environmental aspect – value up to 5

In the event that criterion A4 has a value of 3 or the result of the overall assessment is greater than 6, measures must be taken to reduce the impact of the given environmental aspect.

### 3.1 Direct environmental aspects

Direct environmental aspects are related to the company's activities over which it has direct management control.

Direct environmental aspects include, among others:

#### Air

##### A) Small and medium air pollution sources

The IMS and EMAS representative is responsible, in cooperation with an external expert for the environment, for classifying stationary sources of pollution into the appropriate categories, issuing consent for the operation of the source of air pollution and its operation in



accordance with the manufacturer's documentation and the conditions set in the decision of the government authority.

The administrative premises in which the headquarters of the company is located in Bratislava are rented, the production and administrative premises in the production plants are owned by the company. The company operates small sources of air pollution, which are used for heating production premises and administration in production plants and for supplying the premises of the organization with hot water, and a medium source of air pollution, which is a painting and blasting box.

## B) Mobile pollution sources – operation of cars and machines

The company registers in its possession cars, trucks and tractors and work machines, including mainly mobile cranes, telescopic manipulators, etc.

The transport manager is responsible for the operation of mobile sources of air pollution and the maintenance of these sources in accordance with the equipment manufacturer's conditions and emission limits. The latter is also responsible for maintaining car engines and machines in good technical condition so that emissions do not exceed the permitted limits.

## C) Air-conditioning

The organization operates air-conditioning equipment designed to cool administrative premises in Senec. In the administrative building on Tomášikova, it uses cooled ceiling technology, which is friendlier to the environment and the health of workers. The operating manager is responsible for regular audits and keeping records of these inspections.



## Water

In the company, water is supplied mainly for hygiene needs, fire protection and washing machines and equipment. Water consumption is one of the environmental indicators and is monitored in the company within the Energy and Water Consumption record. These records are used for the creation of goals and improvement of the environmental profile. As

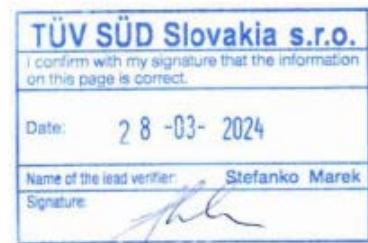
a result of the operation of the organization, municipal waste water (sewerage) and precipitation waste water (discharged from the roofs of buildings and other premises in the organization into surface water) are created. There is a green terrace in the administrative building on Tomášikova Street, which uses rainwater for watering the greenery. In the production area in Trstín, water from the well is used for social purposes, which reduces the consumption of drinking water. Sewage water is diverted through the sewage network to our own sewage treatment plant.

### Waste

The company produces several types of waste during its activities. In both administrative and production facilities, it ensured the separation of waste in both administrative areas and production halls.

Production facilities have the largest share of other waste:

- 15 01 01 – paper and cardboard packaging
- 15 01 02 – plastic packaging
- 17 04 05 – iron and steel
- 17 04 02 – aluminum



The hazardous waste that the company produces in the course of its activity arises mainly from the use of hazardous substances (paints, thinners, sealants...) in the form of contaminated packaging or contaminated rags and gloves.

The largest share of hazardous waste is held by:

- 15 01 10 - packages containing residues of hazardous substances or contaminated with hazardous substances
- 15 02 02 - absorbents, filter materials, including oil filters not otherwise specified, cleaning rags, protective clothing contaminated with hazardous substances

## Soil

The company carries out its main activity outside agricultural land or unpaved surfaces. Soil pollution can only occur in the event of a motor vehicle accident on the construction site or in the areas of operation in Trstín and Senec.



## Noise, vibration and dust

The noise emitted by the organization arises as a result of the operation of vehicles and equipment.

## Accident

An emergency situation is a situation where there is a real threat of environmental pollution. It can arise both in the organization's operations, but also in the field during motor vehicle traffic.

Maintenance and minor repairs of machines and mechanisms are especially risky in warehouse and production areas, where there is a risk of contamination of the environment with dangerous substances, such as non-chlorinated hydraulic oils and other transmission and lubricating oils, etc. The same contamination is also possible during the performance of the company's activities in which motor vehicles are used. In addition, an emergency situation may occur when storing and/or using chemical substances and chemical preparations located in the company's warehouses.



### 3.2 Indirect environmental aspects

Indirect environmental aspects arise as a result of the action of third parties - contractual suppliers of the organization during the implementation of construction contracts. The elimination of the negative effects of these aspects is ensured by the organization through provisions in contractual agreements. A tool for reducing the significance of indirect aspects is the document Waste disposal and recovery plan on the construction site, with which the organization ensures the compliance of suppliers with its environmental standards. Contractors' activities, including the impact on the environment, are continuously checked on construction sites by contract managers. The company expanded the procedure of internal audits to include supplier audits, with the aim of improving their environmental behavior and minimizing environmental impacts.

The company implements, through contractors, mainly parts of the construction in which it does not specialize, or in case of utilization of own capacities.



### 3.3 Final evaluation of environmental aspects

The final evaluation of the environmental aspects is presented in the following table:

ACTIVITY	Air	Waste	Soil	Electricity consumption	Water consumption	Fuel consumption	Noise and vibrations	Accident
<i>Design</i>								
<i>Administration Bratislava</i>								
<b>Trstín</b>								
<i>Administration</i>								
<i>Production</i>								
<b>Senec</b>								
<i>Administration</i>								
<i>Production</i>								
<b>Supporting activities</b>								
<i>Maintenance</i>								

Construction sites								
Import of metal and aluminum profiles for construction	Significant EA	Very significant EA	Significant EA	Unrated EA	Unrated EA	Significant EA	Significant EA	Very significant EA
Installation of profiles	Significant EA	Very significant EA	Significant EA	Significant EA	Significant EA	Significant EA	Very significant EA	Significant EA
Execution of construction works	Significant EA	Very significant EA	Significant EA	Significant EA	Significant EA	Significant EA	Significant EA	Very significant EA
CHL warehousing (glues)	Very significant EA	Very significant EA	Significant EA	Unrated EA	Significant EA	Unrated EA	Significant EA	Very significant EA
Unrated EA	Low significant EA	Significant EA	Very significant EA	Unrated EA	Unrated EA	Unrated EA	Unrated EA	Unrated EA

#### 4. ENVIRONMENTAL GOALS

The company implements the environmental policy by defining goals. The company's management defines long-term environmental goals for a period of 5 years, taking into account significant environmental aspects, applicable legal and internal requirements taking into account risks and opportunities, financial, operational and technical capabilities of the company. Goals are measurable (as far as possible) and developed with knowledge of external and internal influences on their achievement. Long-term goals are elaborated in more detail into annual goals, which are monitored and reviewed annually. The company's goals are communicated with employees through the company's intranet.

##### 4.1 Long-term environmental goals

- ✓ Building IMS and EMAS in order to ensure the sustainable development of the company in accordance with the standards ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018 and the Regulation of the EU Commission on the voluntary participation of organizations in the Community scheme for environmental management
- ✓ In the field of waste management, ensure the separation of waste in operations and on construction sites and thereby minimize unsorted waste stored in landfills
  - Ensure waste separation in facilities
  - Ensure waste separation on construction sites
  - Active compliance monitoring through staff training and internal audits

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- ✓ Modernization of lighting in the halls - replacement of traditional lighting in the halls with LED lighting with the aim of reducing electricity consumption
  - Processing an analysis about the benefits of LED lighting
  - Gradual replacement of traditional light bulbs with LEDs
- ✓ Reduce drinking water consumption packed in PET bottles
  - Analysis of drinking water consumption in PET bottles
  - Selection of an alternative supplier



## 4.2 Short-term environmental goals

- ✓ Modernization of passenger transport with the aim of reducing exhaust emissions and also ensuring greater safety and comfort for transport workers; purchase of at least one electric vehicle (hybrid or fully electric) per year. Evaluation: ✓ partially fulfilled.  
The company has not procured any electric vehicles in 2023. It has sold 7 cars with an emission class less than EURO 6, while all the newly acquired vehicles were with EURO 6 emission class.
- ✓ Organization of internal training of employees in the field of OSH and the environment during the implementation of constructions (work on the construction site with the aim of preventive action to reduce the probability of occupational accidents, as well as the risks of environmental pollution). Evaluation: ✓ fulfilled
- ✓ Obtain or train an own person in the field of "green" and "sustainable buildings" according to the international LEED and BREEAM certification. Evaluation: ✗ unfulfilled, fulfillment postponed to the next year 2024.
- ✓ Improvement of biodiversity: To improve the working environment by planting new trees on the land near the production hall /Trstín, Senec/ Evaluation: ✓ fulfilled
- ✓ To develop a project for the use of photovoltaic cells to convert solar energy into electricity. ✗ unfulfilled, fulfillment postponed to the next year.
- ✓ Replacement of lighting with LED lighting also in the Senec production plant. Evaluation: ✗ unfulfilled, fulfillment postponed to the next year 2024.



## 5. ENVIRONMENTAL BEHAVIOR

Within the internal documents of the integrated management system, INGSTEEL, s.r.o. has established tools for planning, monitoring, analysis and evaluation of the main environmental performance indicators. The company monitors and evaluates its behavior using environmental indicators that have been defined based on the requirements of the Regulation (EC) no. 1221/2009 of the European Parliament and the Council (EC) on the voluntary participation by organizations in a Community eco-management and audit scheme (EMAS), based on the activities carried out by the company, the determination of direct and indirect environmental aspects and impacts, reports on waste, information on the consumption of energy and fuels.

Formula for calculating indicators:

A – Annual entry / exit in the given area

B – A reference value that represents the activity of the organization

R – A / B ratio

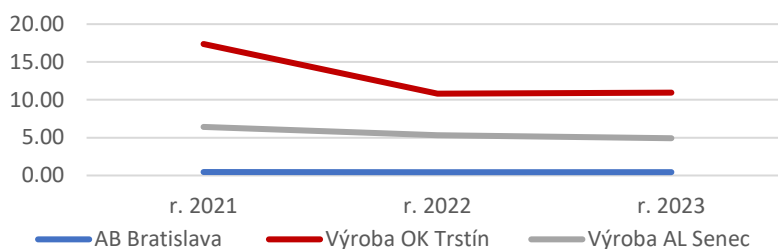
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### 5.1 Energy

The company uses electricity for administrative and mainly production purposes. It monitors electricity consumption separately for each plant. Administrative premises - the company's headquarters are in leased premises. Electricity is mainly consumed here to provide office equipment, so we linked the monitoring of the indicator to the number of people in the administration. In production plants, due to the minimum consumption of the administrative part, the monitoring of electricity is only monitored for the entire production plant. Monitoring of the indicator is linked to the total turnover of the company in mil. EUR. Electricity on construction sites is mostly provided by the customer, and our company pays only a % share of the contract volume. In minimal cases, the electricity is re-invoiced to us according to real consumption.

Electricity		Year 2021	Year 2022	Year 2023
AB Bratislava	Annual consumption (MWh)	21.33	21.07	20.54
	Number of employees	49	49	47
	Indicator	0.44	0.43	0.44
Production of OK Trstín	Annual consumption (MWh)	808.97	721.66	586.53
	Turnover (mil. EUR)	46.56	66.74	53.56
	Indicator	17.37	10.81	10.95
AL production Senec	Annual consumption (MWh)	298.76	356.451	263.60
	Turnover (mil. EUR)	46.56	66.74	53.56
	Indicator	6.42	5.34	4.92

Electricity consumption indicator

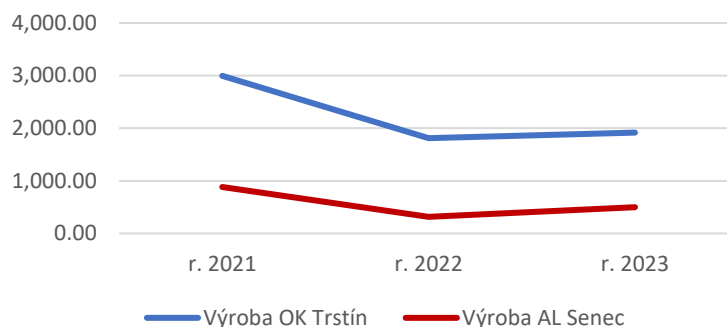


The value of the electricity consumption indicator in the administration is stable in the long term, as many people and used (mostly) IT technology are more or less fixed or with minimal deviations. The electricity consumption in the Trstín plant decreased by 18% year-on-year, while the value of the indicator remained virtually unchanged as a result of the decrease in sales. Consumption decreased by 26% year-on-year at the Senec production plant, with the development of the indicator already having 4. a year in a row declining character. The positive development of electricity consumption was mainly influenced by the modernization of machinery and the replacement of LED lamps.

Gas is used in the company for heating administrative and production premises and for heating domestic hot water. Its consumption depends mainly on climatic conditions. In the administrative premises in which the company is rented, gas consumption is not reported by the lessor, while this is calculated only proportionally to the rented area, therefore it is not monitored for this center. The monitored indicator is calculated as the annual production of gas in m3 to the company's turnover in mil. EUR.

Gas		Year 2021	Year 2022	Year 2023
Production of OK Trstín	Annual consumption (m3)	139 490.00	120 903.00	102 708.00
	Turnover (mil. EUR)	46.56	66.74	53.56
	Indicator	2,995.92	1,811.55	1,917.63
AL production Senec	Annual consumption (m3)	41,101.00	21,077.00	26,657.00
	Turnover (mil. EUR)	46.56	66.74	53.56
	Indicator	882.75	315.81	497.70

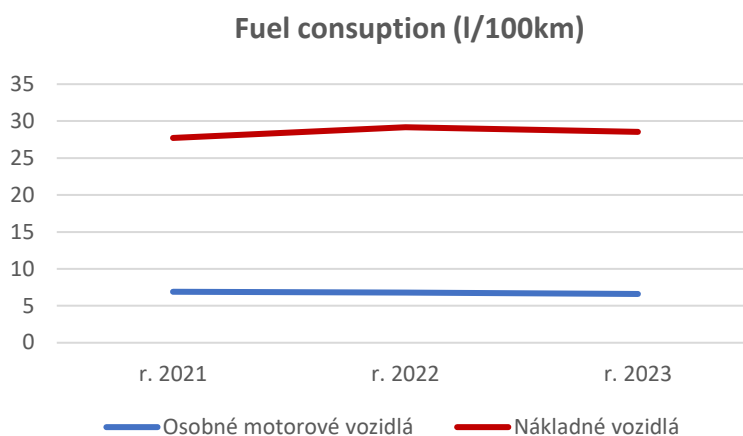
Gas consuption indicator



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The company owns 65 passenger cars and 19 trucks and mechanisms. Fuel consumption is shown in the following table:

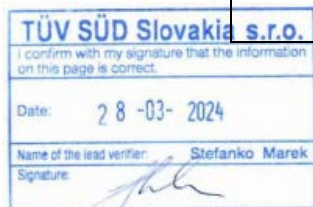
Fuel consumption		Year 2021	Year 2022	Year 2023
Passenger motor vehicles	Consumption in L	107,788	121,145	133,637.00
	Mileage	1,561,930	1,782,547	2,024.35
	Consumption in l/100km	6.90	6.80	6.60
Trucks	Consumption in L	71,325	81,766	75,133
	Mileage	257,285	280,291	263,180
	Consumption in l/100km	27.72	29.17	28.55



## 5.2 Materials

The company manufactures steel structures at the production plant in Trstín, therefore the main commodity monitored is steel, and at the production plant in Senec, the production of glazed aluminum structures, therefore other monitored commodities are aluminum and glass. The consumption of the mentioned materials depends on the nature of the orders obtained. The monitored indicator is calculated as the annual production of steel/aluminum/glass in tons to the company's turnover in mil. EUR.

Material		Year 2021	Year 2022	Year 2023
Production of OK Trstín	Annual steel consumption (t)	5,511.00	3,944.00	3,167.00
	Turnover (mil. EUR)	46.56	66.74	53.56
	Indicator	118.36	118.36	59.13



Material		Year 2021	Year 2022	Year 2023
AL production Senec	Annual aluminum consumption (t)	268.00	302.00	18.40
	Turnover (mil. EUR)	46.56	66.74	53.56
	Indicator	5.76	4.53	0.34
	Annual glass consumption (t)	1,273.00	997.41	287.16
	Turnover (mil. EUR)	46.56	66.74	53.56
	Indicator	27.37	27.37	5.36

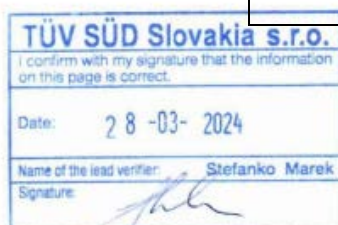
The indicator of material consumption had a variable character during the monitored period, which depends on the currently executed orders.

### 5.3 Water

Water is provided at all workplaces of the company. Drinking water is provided from the public water supply in the administration and production facilities. In the administrative premises in which the company is rented, water consumption is not reported by the lessor and this is calculated according to the area of the rented premises, therefore it is not monitored for this center. In the production plant in Senec, water from the public water supply is also used for social purposes. Water on construction sites is mostly provided by the customer, and our company pays only a % share of the contract volume. In minimal cases, it is re-invoiced to us according to real consumption.

The monitored indicator is calculated as the annual production of water from the public water supply in m3 to the company's turnover in mil.

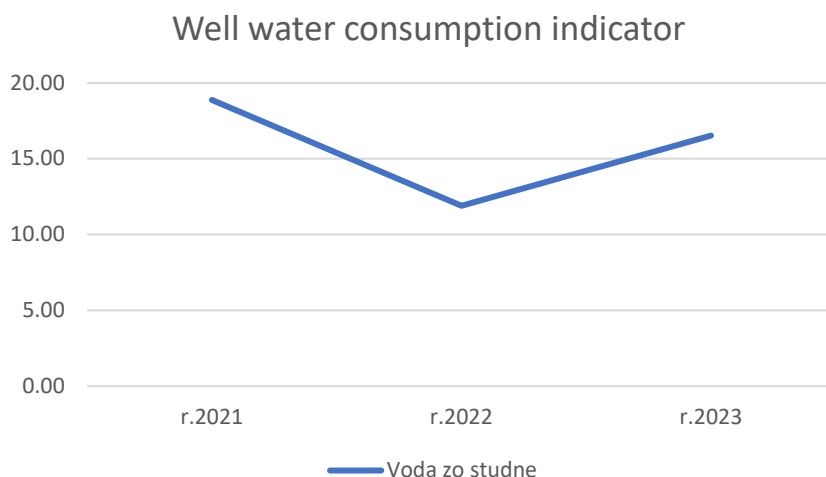
Water from the public water supply		Year 2021	Year 2022	Year 2023
Production of OK Trstín	Annual consumption (m3)	270.00	473.00	398.00
	Turnover (mil. EUR)	46.56	66.74	53.56
	Indicator	5.80	7.09	7.43
AL production Senec	Annual consumption (m3)	377.00	527.00	367.00
	Turnover (mil. EUR)	46.56	66.74	53.56
	Indicator	13.80	7.90	6.85



Water consumption in the production plant in Trstín was variable during the monitored period. In the production plant in Senec, it had a downward trend.

In the production plant in Trstín, there is a well for service water, used for social purposes and irrigation, which reduces the need for drinking water for these purposes.

Well water		Year 2021	Year 2022	Year 2023
Production of OK Trstín	Annual consumption (m3)	879	794	885
	Turnover (mil. EUR)	46,56	66,74	53,56
	Indicator	18,88	11,90	16,52




### 5.4 Waste

The waste that the company creates during its activities results mainly from the nature of the orders. The company fulfills all obligations related to waste management, mainly waste registration by category and catalog numbers and reporting obligations.

Detailed records of waste by category NO and OO are shown in the tables.



Waste catalog number	Waste name	Category	2021	2022	2023
13 01 11	Synthetic hydraulic oils	NO		0,25	
13 02 06	Synthetic engine, gear and lubricating oils	NO		0,25	
15 01 10	Packaging containing NL residues	NO	0,64	0,75	1,44
15 01 11	Metal waste containing NL	NO			0,06
15 02 02	Absorbents...	NO	0,48	0,75	0,70
20 01 35	Decommissioned devices containing hazardous parts	NO			0,74
17 04 09	Metal waste contaminated by NL	NO	3,63	4,62	9,00
<b>Waste - NO category</b>			<b>4,75</b>	<b>6,62</b>	<b>11,94</b>
Waste catalog number	Waste name	Category	2021	2022	2023
07 02 13	Plastic waste	OO	0,74	0,90	2,35
15 01 01	Paper and cardboard waste	OO	7,63	9,04	5,72
15 01 02	Plastic packaging	OO	4,69	5,23	1,69
15 01 03	Wooden packaging	OO	2,40	1,38	7,08
15 01 06	Mixed packaging	OO	10,34	18,34	17,17
15 01 07	Glass packaging	OO	0,04		
16 02 14	Decommissioned devices other than 16 02 09 to 16 02 12	OO	0,35	0,28	
17 01 01	Concrete	OO	68,62	372,83	502,47
17 01 02	Bricks	OO			
17 01 07	Mixtures of concrete, bricks, tiles...	OO	2 042,68	585,15	44,68
17 02 01	Wood		82,60	11,17	19,52
17 02 02	Glass	OO	4,70		
17 03 02	Concrete mixtures other than in 17 03 01				12,98
17 04 02	Aluminum	OO		3,29	6,65
17 04 05	Iron and steel	OO	2,45	61,12	52,04
17 04 07	Mixed metals	OO	101,04	0,00	

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Waste catalog number	Waste name	Category	Year		
			2021	2022	2023
17 05 04	Soil and aggregate	OO	1 509,48	5 908,89	138,00
17 05 06	Excavated soil	OO			4 127,34
17 06 04	Insulating materials other than...	OO		30,41	20,97
17 09 04	Mixed waste from constructions and	OO	27,70	364,27	552,48
19 12 04	Plastics and rubber	OO	92,56	0,32	3,32
20 01 01	Paper and cardboard	OO		0,99	
20 03 07	Bulky waste	OO		0,15	1,41
<b>Waste - OO category</b>			<b>3 957,88</b>	<b>7 392,43</b>	<b>5 496,87</b>

The monitored indicator in the field of waste is calculated as the amount of produced waste in the category O-other waste or the category N-hazardous waste in tons to the company's turnover in millions. EUR.

Waste		Year		
		2021	2022	2023
Production of OK Trstín	Amount of category OO waste (t)	47,20	39,10	81,47
	Turnover (mil. EUR)	46,56	66,74	53,56
	Indicator	1,01	0,59	1,52
	Amount of category NO waste (t)	2,22	5,92	10,18
	Turnover (mil. EUR)	46,56	66,74	53,56
	Indicator	0,05	0,09	0,19
AL production Senec	Amount of category OO waste (t)	11,10	16,34	61,08
	Turnover (mil. EUR)	46,56	66,74	53,56
	Indicator	0,24	0,24	1,14
	Amount of category NO waste (t)	2,42	0,70	0,96
	Turnover (mil. EUR)	46,56	66,74	53,56
	Indicator	0,05	0,01	0,02
Construction sites	Amount of category OO waste (t)	3 899,58	7 337,00	5 441,95
	Turnover (mil. EUR)	46,56	66,74	53,56
	Indicator	83,75	109,93	101,60
	Amount of category NO waste (t)	0,11	0,00	0,80
	Turnover (mil. EUR)	46,56	66,74	53,56
	Indicator	0,002	0,00	0,01



### 5.5 Biodiversity-friendly land use

The use of land in production facilities in Trstín and Senec is given historically. The production site in Senec is located in a built-up industrial zone, where there is currently no possibility of expanding the areas. In the production plant in Trstín, the company plans to expand the site in the long term, while planning will also take into account the use of land with regard to biodiversity. The company headquarters on Tomášikova Street in Bratislava is under long-term lease. The building is entirely surrounded by a park belonging to the city district. The company has a terrace built on the roof of the building with an area of 36 m2 in its rented premises.

The indicator determined for this area is calculated as a percentage of the green area in m2 to the total area in m2:

Biodiversity		Year 2021	Year 2022	Year 2023
Production of OK Trstín	Total area (m2)	39 992,00	39 992,00	39 992,00
	Green area (m2)	15 321,00	15 321,00	15 321,00
	Indicator	38%	38%	38%
AL production Senec	Total area (m2)	13 198,00	13 198,00	13 198,00
	Green area (m2)	26,00	26,00	26,00
	Indicator	0.2%	0.2%	0.2%

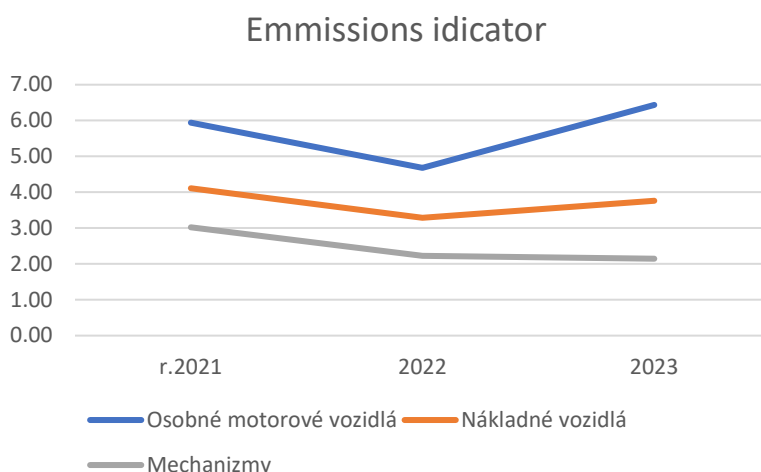
In 2023, the company supported biodiversity by involving employees in volunteer activities in cooperation with the Bratislava Regional Conservation Association <https://broz.sk/en/our-mission/> and internal company events focused on planting plants.

### 5.6 Emissions

In the area of produced CO2 emissions, we monitor for the company the emissions resulting from the use of motor vehicles (cars and trucks) and mechanisms and gas consumption. The monitored indicator is calculated as the annual production of CO2 emissions in tons to the company's turnover in mil. EUR.



Emissions		Year 2021	Year 2022	Year 2023
Passenger motor vehicles	CO2 emissions (t)	276,63	312,33	344,68
	Turnover (mil. EUR)	46,56	66,74	53,56
	Indicator	5,94	4,68	6,44
Trucks	CO2 emissions (t)	191,37	219,39	201,59
	Turnover (mil. EUR)	46,56	66,74	53,56
	Indicator	4,11	3,29	3,76
Mechanisms	CO2 emissions (t)	140,69	148,36	114,92
	Turnover (mil. EUR)	46,56	66,74	53,56
	Indicator	3,02	2,22	2,15



The company operates medium sources of air pollution in the Trstín and Senec operations, the development of emissions is reported annually via the NEIS portal. Data on emission indicators of medium sources of air pollution are presented in the following table. The company has carried out authorized emission measurements, the result of which is that the measured emission values are in accordance with the limits and requirements established by law.

Emissions medium sources of air pollution		2021	2022	2023
Senec	TZL	0,002719	0,001602	0,001756
	SO <sub>2</sub> /SO <sub>x</sub>	0,000326	0,000192	0,000210
	NO <sub>x</sub> as NO <sub>2</sub>	0,053024	0,031236	0,034236
	CO	0,021414	0,012615	0,013826
	TOC	0,003569	0,002102	0,002304
	<b>Emissions medium sources total (t)</b>	<b>0,081052</b>	<b>0,047747</b>	<b>0,052332</b>
	Turnover (mil. EUR)	46,56	66,74	53,56
Indicator	0,001741	0,000715	0,000977	
		<b>2021</b>	<b>2022</b>	<b>2023</b>

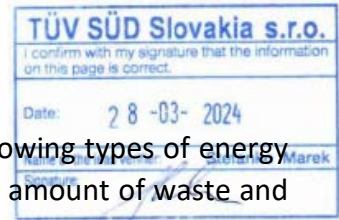
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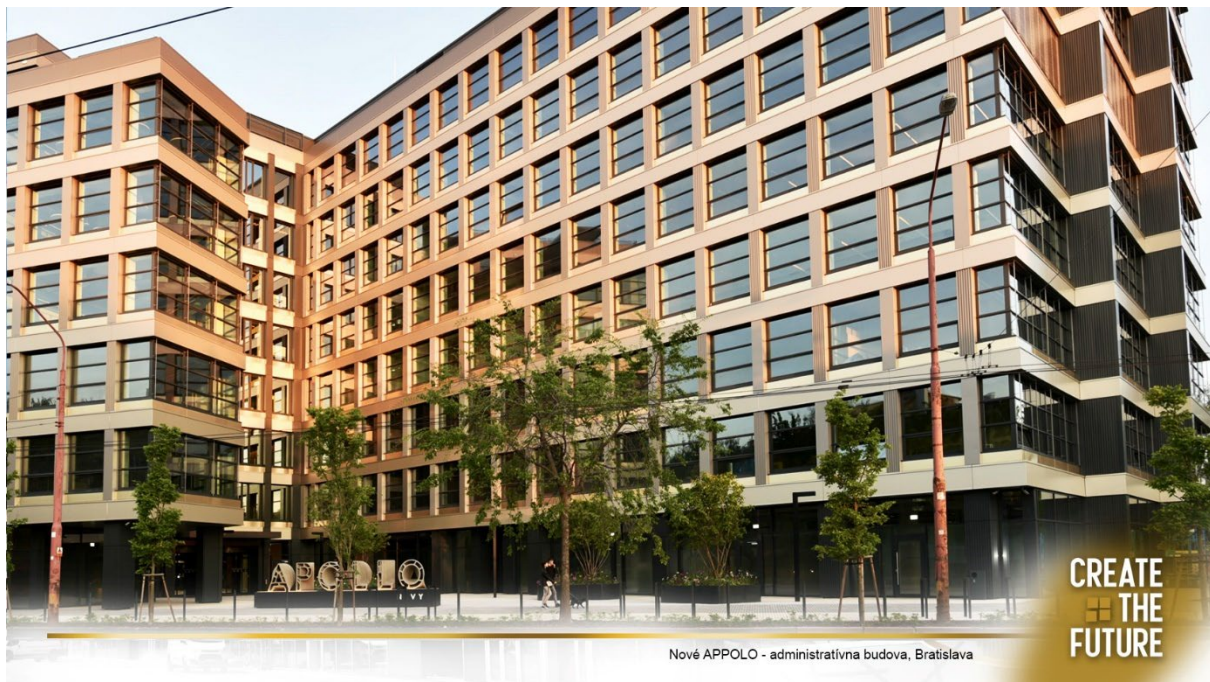
Trstín	TZL	0,044477	0,075789	0,076278
	SO <sub>2</sub> /SO <sub>x</sub>	0,001272	0,001103	0,000937
	NO <sub>x</sub> as NO <sub>2</sub>	0,206724	0,179178	0,152213
	CO	0,083485	0,07236	0,061471
	TOC	1,732492	3,212133	2,880922
	<b>Emissions medium sources total (t)</b>	<b>2,06845</b>	<b>3,540563</b>	<b>3,171821</b>
	Turnover (mil. EUR)	46,56	66,74	53,56
	Indicator	0,044425	0,053050	0,059220



### 5.7 Summary of indicators

In 2022, the company INGSTEEL, spol. s r. o. consumed the following types of energy and materials for EUR 1 million in turnover, or produced the following amount of waste and emissions:

59.13 t steel	5.36 t glass	0.34 t aluminum
14,28 m3 water from the public water supply	turnover 1 mil. EUR	2,415.33 m3 gas
16,52 m3 water from own source		16.31 MWh electricity
2.87 t waste in facilities	101.61 t waste on construction sites	12.40 t CO2 emissions



## 6. APPLICABLE LEGAL REQUIREMENTS

The company is committed to complying with legal and other requirements within the framework of the Environmental Policy statement. In order to be able to continuously fulfill this commitment, all legislative and other requirements imposed on the services performed were identified through the document Register of Legal Requirements, where each environmental aspect was assigned a relevant legislative or other regulation. The legal requirements are binding on all employees and suppliers of the company. They are regularly evaluated as part of internal audits, and the results are part of management reviews. The IMS and EMAS representative ensures regular updating of legal requirements and compliance of internal documents with them.


Act	Provision	Obligation
<b>Final draft of the Sectoral Reference Document for the Construction Industry, 09/2012</b>		
<b>Environment Act no. 17/1992 Coll. as amended</b>	Article 18	Monitor the impact of the use of natural resources on the environment (in particular, consumption)
<b>Act no. 355/2007 Coll. on the protection, support and development of public health, as amended</b>	Article 30, paragraph 1 letter a)	ensure measures that reduce exposure to physical, chemical, biological and other factors to the lowest attainable level or to the level of limits according to special regulations
	Article 36, paragraph 1	ensure sufficient lighting of work spaces
	Article 38, paragraph 3	ensure the assessment of mental and sensory stress, ensure measures to mitigate it, comply with the minimum requirements for working with display units
<b>Regulation No. 276/2006 Coll. on the minimum safety and health requirements for working with display units</b>	Article 5 letter b)	to train employees before being assigned to such work and after each significant change,
	Article 6	ensure regular interruptions of work no later than after four hours of continuous work
	Article 7, paragraph 1	ensure assessment of medical fitness
	Article 7, paragraph 4	if necessary, to provide an examination of the support, movement and nervous system
<b>Act no. 79/2015 Coll. on waste</b>	Article 14, paragraph 1), letter a)	Sort waste correctly
	Article 14, paragraph 1), letter b)	collect sorted waste
	Article 14, paragraph 1), letter c)	Collect hazardous waste separately, label it and dispose of it in accordance with this law
<b>Act no. 79/2015 Coll. on waste</b>	Article 14, paragraph 1), letter e)	hand over the waste only to a person authorized to dispose of the waste
	Article 14, paragraph 1), letter f)	maintain and keep records on the types and amount of waste and on their disposal,



	Article 14, paragraph 1), letter g)	report data from the records to the competent body of the State Administration of Waste Management and store the reported data,
	Article 14, paragraph 1), letter i)	store waste for a maximum of one year or collect waste for a maximum of one year before its disposal or for a maximum of three years before its recovery
	Article 25, paragraph 1	prohibition to mix NO without permission
	Article 26, paragraph 2), letter b)	Report the data from the records by the 10th day of the month following the month of export
	Article 26, paragraph 3)	SLNO confirmation
	Article 54 paragraph 1 letter a)	The packaging manufacturer is obliged to ensure that the packaging is marked with information on the material composition of the packaging in accordance with a special regulation, if he decides to mark the packaging; the package can also be marked with information on how to handle it
	Article 54 paragraph 1 letter c)	The manufacturer of the packaging is obliged to ensure that the marking according to letters a) and b) is visible and easy to read, while it must be sufficiently permanent and still even after the packaging has been opened
	Article 54 paragraph 1 letter d)	The manufacturer of packaging is obliged to ensure the collection, transport, recovery and recycling of waste originating from the packaging that he has put on the market or distributed, in full, at least to the extent of the recovery and recycling rate
	Article 54, paragraph 4	For the purpose of recording collection and evaluation, reusable packaging is included in the amount of packaging that the packaging manufacturer put on the market or distributed only once, namely at the time of their first use; the above does not apply to wooden pallets, which are counted in the quantity of packaging only when they become waste.
	Article 77 section 2	The originator of construction and demolition waste is a legal entity or a entrepreneur who has been issued a permit under the Building Act (building permit, notification...). In the case of works carried out for entrepreneurs, the waste producer is the person who carries out the works.
	Article 77 paragraph 3 letter a)	to ensure the recovery, recycling or reuse of at least 70 % by weight of construction and demolition waste in the case of buildings with a built-up area greater than 300 m <sup>2</sup> (applies to Group 17 wastes except NO and 17 05 04 - soil and aggregates other than those mentioned in 17 05 03) - for buildings with a built-up area < 300 m <sup>2</sup> which also meet the characteristics of a simple building, the 70 % obligation does not apply)
Act no. 79/2015 Coll. on waste	Article 77 paragraph 3 letter b)	carry out selective demolition in accordance with the procedures laid down in the implementing regulation
	Article 77 paragraph 3 letter c)	to preferentially recover construction and demolition waste and to preferentially use the output from recycling carried out at the place of origin in their activities, if the technical, economic and organisational conditions allow
	Article 77 paragraph 3 letter d)	be able to demonstrate the conclusion of a contract for the management of construction waste to the extent specified in the implementing regulation prior to the generation of waste
	Article 77 paragraph 3 letter d)	on the forms set out in Annexes 2 and 3 to the Implementing Regulation at least 3 days before implementation demolition works, notify the competent district authority in writing of the method of selective demolition (+ photo documentation) and the planned method of recovery or disposal of the construction waste and, no later than 90 days after completion of the demolition works, report in writing to the district authority the evaluation of the selective demolition and the method of recovery or disposal of the construction waste (+ photo documentation)
	Article 81 paragraph 1 letter a)	The municipality is responsible for managing municipal waste if it is mixed waste from other sources.

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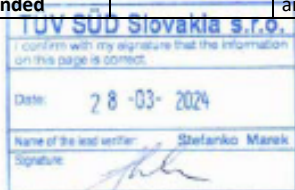
	Article 81 paragraph 1 letter b)	An entrepreneur and a legal entity – is responsible for the management of municipal waste as the source of the waste, if it concerns: 1. separately collected waste from other sources not covered by extended producer responsibility, 2. e-waste and used batteries and accumulators, 3. separately collected packaging waste from other sources and separately collected waste from non-packaged products from other sources.
<b>Decree No 344/2022 Coll. on construction and demolition waste</b>	Its full version	
<b>442/2002 Coll. ACT of 19 June 2002 on public water supply and public sewerage</b>	Article 23, paragraph 1	contract with the operator of the public sewage system
<b>442/2002 Coll. ACT of 19 June 2002 on public water supply and public sewerage</b>	Article 23, paragraph 5	discharge only water with a level of pollution and quantity corresponding to the public sewerage regulations of the sewerage operator
	Article 26	comply with the customer's obligations
<b>Act no. 146/2023 Coll. on air</b>	Article 34, paragraph 1), letter a)	operate the stationary source in accordance with the permit, documentation and with the supervision of the source operation ensured
	Article 34, paragraph 1), letter b)	comply with the emission limits specified in the permit; if emission limits are not specified, comply with the emission limits laid down in the implementing regulation pursuant to § 62(f),
	Article 34, paragraph 1), letter c	comply with the technical requirements and operating conditions specified in the permit; where technical requirements and operating conditions are not specified, comply with the established technical requirements and operating conditions laid down in the implementing regulation pursuant to § 62(f)
	Article 34, paragraph 1), letter d	burn only fuels specified in the permit; if fuel requirements are not specified, burn only fuels specified in the plant documentation which meet the fuel quality requirements laid down in the implementing regulation pursuant to § 62(l)
	Article 34, paragraph 1), letter j.	notify the permitting authority of the change of the operator of the source or part of the source and the cessation of the source within 30 days of their occurrence
	Article 34, paragraph 2), letter a	submit to the district authority a draft procedure for calculating the quantity of emissions for approval before the source is put into operation and before a change to the source is put into operation, unless the authority decides otherwise; update it if necessary
	Article 34, paragraph 2), letter c	keep operational records of the stationary source in the manner prescribed by the implementing regulation pursuant to Section 62(h) and retain the monitored data and documents for the prescribed period of time
	Article 34, paragraph 2), letter d	annually, by the end of February, report selected, complete and true data on the stationary source
	Article 34, paragraph 7), letter a	remedy without delay malfunctions and accidents in the operation of the stationary source and comply with the measures specified in the approved sets of parameters and measures
	Article 35, paragraph 1), letter a	commission and operate the small source in accordance with the documentation and conditions specified by the municipality
	Article 35, paragraph 1), letter b	comply with the technical requirements and operating conditions for small sources laid down in the implementing regulation
<b>Act no. 146/2023 Coll. on air</b>	Article 35, paragraph 1), letter d	burn only fuels specified in the permit which meet the fuel quality requirements laid down in the implementing regulation pursuant to § 62(l); where fuel requirements are neither specified nor laid down, he shall burn only fuels specified in the plant documentation
	Article 35, paragraph 1), letter k	keep an operational record of the small source and, on request, provide the data laid down in the implementing regulation pursuant to Section 62(h) and other data necessary for the determination of emissions to the municipality or a person authorised by the municipality

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	Article 35, paragraph 1), letter L	notify the municipality of the change of the operator of the source or its part and the termination of the source within 30 days from the date of their implementation
<b>Act No. 190/2023 Coll. on air pollution charges</b>	Article 3, paragraph 1	The fee for emissions from a small source listed in Annex 3, Part A. shall be paid if the municipality in the territory of which the small source is located so stipulates by a generally binding ordinance.
<b>Act no. 286/2009 Coll on fluorinated greenhouse gases</b>	Article 3, paragraph 1	Fluorinated greenhouse gases or products and equipment may be handled only by entrepreneurs or legal persons, provided that they comply with the conditions laid down in this Act and a special regulation.
	Article 3, paragraph 2	The owner of an installation that contains fluorinated greenhouse gases in quantities of five tonnes of CO2 equivalent or more and in a form other than foam and is controlled for leakage shall designate an operator of the installation within 30 days of the installation being put into operation; the operator shall The owner of the installation may also be the operator of the installation. If the owner of the installation does not designate the operator of the installation, he shall become the operator of the installation.
	Article 4, paragraph 1	The operator of the installation is obliged to ensure the requirements according to the specific regulation (Articles 3-5 of EU Regulation No 517/2014) and to ensure additional measures to avoid excess releases of fluorinated greenhouse gases.
	Article 5, paragraph 1	The operator of an installation which contains fluorinated greenhouse gases in a quantity of five tonnes of CO2 equivalent or more and in a form other than foam and is controlled for leakage according to a special regulation shall keep records of fluorinated greenhouse gases, products and equipment according to a special regulation.
	Article 5, paragraph 2	The operator of an installation referred to in paragraph 1 shall be obliged to report data on fluorinated greenhouse gases, products and equipment to the competent district authority annually, by 31 March of the following year at the latest.
<b>Act no. 106/2018 Coll. on the operation of vehicles in road traffic</b>	Article 45, paragraph 1, letter a)	ensure that the vehicle complies with the essential conditions for the operation of the vehicle in road traffic
<b>Act no. 106/2018 Coll. on the operation of vehicles in road traffic</b>	Article 45, paragraph 1, letter b)	have your vehicle regularly checked for roadworthiness and emissions
	Article 39, paragraph 1	have a registration certificate and a vehicle registration certificate
<b>Act no. 364/2004 Coll. on Water as amended</b>	Article 9, paragraph 1)	Water quality must not threaten the health of people, animals, soil, crops, and the condition of surface and underground waters
	Article 39, paragraph 4, letter a)	Whoever regularly handles solid pollutants in quantities greater than 1 t or liquid pollutants in quantities greater than 1 m3 or handles solid priority hazardous substances in quantities greater than 0,3 t or liquid priority hazardous substances in quantities greater than 0,3 m3 as part of a production process or other activity shall be obliged to draw up a preventive measures plan
<b>Act no. 67/2010 Coll. on the conditions for placing chemical substances and preparations on the market</b>	Article 3 and Article 4 Article 6, paragraph 1	labeling of CHL and CH mixture Safety Data Sheet in Slovak language
<b>Act no. 359/2007 Coll. on the prevention and remediation of environmental damage</b>	Article 13, paragraph 1	ensure financial coverage of liability for environmental damage
<b>Act No. 543/2002 Coll. on nature and landscape protection</b>	Article 47, paragraph 1	It is forbidden to damage and destroy trees
	Article 47, paragraph 2	The owner, manager or lessee of the land on which the tree is located is obliged to take care of it, in particular to treat and maintain it.
	Article 47, paragraph 3	For the felling of woody plants (trees with a trunk circumference of up to 40 cm, measured at a height of 130 cm above the ground, and continuous shrubbery in the built-up area of the municipality with an area of up to 10 m2 and beyond the boundaries of the built-up area of the municipality with an area of up to 20 m2) requires the consent of the nature protection authority
<b>Decree No. 170/2021 Coll. implementing Act No. 543/2002 Coll. on Nature and Landscape Protection, as amended</b>	Article 22	Details on the protection, care and maintenance of trees, on the conditions for issuing consent for felling trees, on the details of the notification of felling of trees and the method of marking the felling of trees





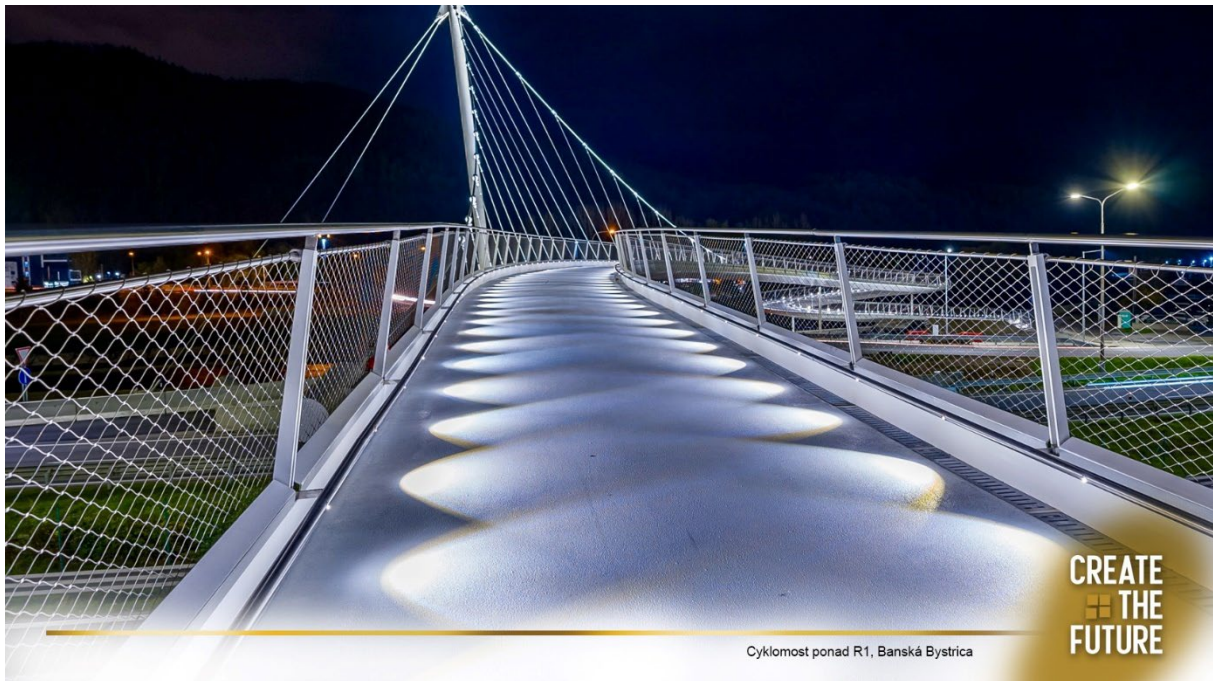
## 7. ENVIRONMENTAL VERIFICATION

INGSTEEL ensures the annual processing of the environmental statement and verification of this statement by a registered verifier. In the sense of Annex IV of the Regulation, the environmental statement includes the following areas:

- a) An overview of the activities, products and services of the organization and a clear description of the content of the registration in the EMAS scheme, including a list of sites covered by this registration
- b) Environmental policy and description of the management structure of the company supporting the environmental management system
- c) A description of the significant direct and indirect environmental aspects that cause significant environmental impacts of the organization, a description of the determination of their significance and an explanation of the nature of the impacts related to these aspects
- d) Description of long-term and short-term environmental objectives in relation to significant environmental aspects and impacts
- e) description of implemented and planned measures to improve environmental behavior, achieve short-term and long-term goals and ensure compliance with legal requirements related to the environment.
- f) a summary of available data on the environmental behavior of the organization in relation to its significant environmental aspects. In the report, we present the main indicators as well as the specific indicators of environmental behavior listed in section C. If short-term and long-term environmental goals are set, we report the relevant data
- g) a reference to the main legal provisions that the organization must take into account to ensure compliance with environmental legal requirements and a statement of legal compliance
- h) the name and number of the accreditation or license of the environmental verifier and the date of declaration of validity



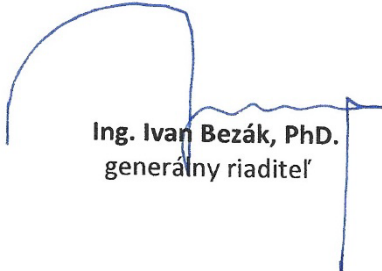
The environmental statement must contain at least the elements listed in letters e) to h) and meet the minimum requirements outlined in the said letters.



The CEO of INGSTEEL declares that all the information in this statement is true.

The stakeholders will be immediately notified if there are any changes to these stated facts.

Environmental validator:  
TÜV SÜD Slovakia s.r.o.  
Management systems certification body  
Jašíkova 6, 821 03 Bratislava, Company ID: 35,852 216  
EMAS verifier registration number: SK-V-0003



**Ing. Ivan Bezák, PhD.**  
generálny riaditeľ

In Bratislava on 11 March 2023

