

## Internal Control System in the R.Power Group

### 1. Purpose and Scope of the System

The purpose of the Internal Control System (ICS) in the R.Power Group is to ensure operational efficiency, reliability of financial reporting, regulatory compliance, and to mitigate risks significant to the Group's operations.

The system covers all companies within the R.Power Group and applies to operational, financial, legal, and project-related processes. Nomad Electric Sp. z o.o. and Quanta Sp. z o.o. should treat the following provisions as recommendations and guidance for building their own Internal Control System.

### 2. System Structure

**The system is based on a three-lines-of-defense model:**

- First line of defense – Operational management (business units), responsible for risk identification and implementation of control mechanisms in daily operations.
- Second line of defense – Support functions, such as Compliance, Legal, Finance, IT, and Health & Safety departments – provide frameworks and tools for risk management and support controls.
- Third line of defense – Internal Audit, an independent function that assesses ICS effectiveness and recommends improvements ( It will be effective upon establishment of the Internal Audit unit in the structure of the R.Power Group).

### 3. The internal control system at R.Power S.A. includes:

**Self-control** involves employees checking the correctness of their own work based on applicable laws and job responsibilities, considering the provisions of this regulation. Self-control is carried out within the scope of assigned duties during day-to-day tasks.

**Functional control** refers to all activities based on applicable procedures that enable compliance with company management directives. This type of control allows management staff to take necessary actions to identify and mitigate risks that could hinder the achievement of objectives by organizational units.

### 4. ICS Components

**The main components of the system include:**

- Policies and procedures – documents regulating how processes are carried out and responsibilities assigned.
- Risk management – identification, analysis, and assessment of risks; implementation of mitigating actions.
- Operational and financial controls – preventive and detective activities (e.g., approvals, segregation of duties, audits).

- Training and awareness – educating employees on risks and controls.
- Monitoring and reporting – ongoing performance monitoring, audits, and reporting of irregularities.

## 5. System Evaluation Process

**The effectiveness of the ICS is assessed periodically and includes:**

- Reviewing and updating the risk map,
- Testing selected control mechanisms,
- Analyzing violations and incidents,
- Reporting results to appropriate committees and the management board.

## 6. Role of Management

Group management is responsible for implementing and maintaining effective internal controls within their areas, including:

- Ensuring actions are in line with applicable procedures,
- Responding to incidents and implementing corrective measures,
- Promoting a culture of integrity and accountability.

## 7. Control Culture and Ethics

The foundation of the ICS at R.Power Group is ethical conduct, transparency of actions, and openness to reporting irregularities. The Group fosters a culture of compliance through:

- Code of Ethics,
- Whistleblowing channels,
- Training in compliance and risk areas.

## 8. Reporting

Heads of organizational units prepare semi-annual functional control plans. Reports on the implementation of these plans are submitted to the Compliance Officer by August 31 and January 31 of each calendar year.

The Compliance Officer prepares a consolidated semi-annual report on internal control implementation for R.OBRICK by the end of Q3 for the first half of the year and by the end of Q1 for the second half of the previous calendar year.

Semi-annual control/compliance test plans require approval from R.OBRICK. The results of these controls/tests are reported semi-annually to R.OBRICK and the Risk and Audit Committee of the Supervisory Board of R.Power S.A.