REMONTOWA SHIPBUILDING | MEMBER OF REMONTOWA HOLDING S.A.

POLICY ON CONTROL OF TRADE IN STRATEGIC GOODS

POLICY STATEMENT

on control of trade in goods, technologies and services of strategic importance by Remontowa Shipbuilding S.A.

A manufacturing company, Remontowa Shipbuilding S.A., builds and repairs vessels and metal structures along with the provision of design documentation, also trading with foreign countries for this purpose, for instance by the purchase of supplies, technology, maintenance services and the sale of finished products.

The company is committed to meeting customer and national and international regulatory requirements.

As regards trade in goods, technologies and services of strategic importance for state security, and for the international peace and security to be maintained, these objectives are achieved through:

- implementation and maintenance of the Integrated Management System including such elements as Quality Management System (QMS) compliant with ISO 9001:2015 and the standardisation publication AQAP 2110:2016, and an Internal Control System that meets the requirements of Article 11(2) of the Act of 29 November 2000 on Foreign Trade in Goods, Technologies and Services of Strategic Significance for State Security, and for the Maintenance of International Peace and Security (consolidated text Dz. U. – Journal of Laws of 10 August 2023, item 1582, as amended in the Journal of Laws of 7 April 2026, item 471) and applicable current national and international acts and regulations, including – the European Union legislation;
- strict definition of statutory liability for employees involved in the control of foreign trade in strategic goods, technologies and services (TS) and sanctions for failure to comply with it, building their awareness and commitment that the profit may not be gained in a manner contrary to the policy of the Polish State and the European Union on the control of trade in strategic goods (TS);
- a thorough survey of the risks of transactions arising from the reliability of counterparties and possible misuse, informing the competent authorities in the event of risks, including notification of the intention to import certain dual-use items and the cessation of trade when in breach of national and international law;
- ensuring supervision of the strategic goods and technologies used and the services provided regarding strategic goods – as required by the Act of 29 November 2000 and the ICS;
- appointment of a Board Representative for the ICS, with a mandate to oversee the control of trade in sensitive goods and technologies and services pertaining to sensitive goods, responsible for maintaining and improving the ICS, along with keeping Books of records of trade in sensitive goods and Books of records of services related to sensitive goods, by type of trade and service, and maintaining and preserving documented information related thereto;
- designation of persons responsible for:
  - analysis of transaction risks, vetting of customers and suppliers, analysis of the specifics of the final product and of the strategic products used in terms of the risks of violating international trade rules for these products;
  - development and updating of a Classification Database of all materials and equipment imported into the Yard, including TS (and Yard products) and assigning them indexes and appropriate control ICS codes, taking into account the current EU Dual-Use List and the current national Armament List;
  - analysis and supervision of changes introduced during the manufacture of products in terms of their impact on changing the parameters and intended use of the products – as per the Act of 29 November 2000 and the ICS;
  - overseeing the circulation, storage and security of recorded information relating to goods, technologies and services of strategic importance, including – classified information (constituting state or official secrets).

These goods are traded in accordance with the Remontowa Shipbuilding S.A. Internal Control System (ICS), as set forth in the ICS Book and Procedures. The ICS is to ensure that transactions are conducted in full compliance with applicable laws and international obligations aimed at maintaining peace and security worldwide, and to identify transactions that fail to comply with these requirements in order to prevent them from being implemented.

The effectiveness of the ICS business is contingent on the awareness and commitment of its employees, their knowledge of the State's policies and the current state of the law, and their full responsibility for the activities carried out. All the employees of Remontowa Shipbuilding S.A. and companies cooperating in the execution of ICS tasks have examined this Statement..., ICS tasks as specified in the ICS Book and Procedures, the Remontowa Shipbuilding S.A. Organisational Rules, national and international regulations, including the European Union legislation, referred to in the ICS Book Supplement, and sanctions for non-compliance with the requirements arising from the Act of 29 November 2000 on Foreign Trade in Goods, Technologies and Services of Strategic Significance for State Security, and for the Maintenance of International Peace and Security (consolidated text Dz. U. – Journal of Laws of 10 August 2023, item.1582, as amended in the Journal of Laws of 7 April 2026), and the acts implementing the Act.

We feel personally responsible for the implementation of the ICS tasks declared in this Statement... and will be pursuing every effort leading to full compliance with the commitments made.

CHIEF EXECUTIVE OFFICER	VICE PRESIDENT OF THE BOARD
Gdańsk, 26th of June, 2026	Dariusz JAGUSZEWSKI	Bartłomiej POMIERSKI