



Sustainability Strategy

Wirtualna Polska Holding
2026 - 2030



“We strive to be the first-choice destination for information and services that engage, entertain, and inspire everyday choices.”

Wirtualna Polska Holding Mission

Letter CFO

Dear Stakeholders,

We are pleased to present the updated WP Group Sustainability Strategy for 2026–2030. It represents a natural continuation of the direction we set in 2022 with the publication of our first strategy.

As one of the largest technology groups operating online, we have a real impact on millions of internet users, customers, and business partners. We employ more than 4,000 people and operate across eight markets in Central Europe and the DACH region. This scale means real influence. The nature of our business model — built on credible media, travel platforms, and digital services — allows us to create value for people, the economy, and the planet, and to support millions of people in making informed decisions.

This Strategy is an integral part of our business model. In the environmental area, we focus on reducing greenhouse gas emissions in line with our adopted decarbonisation pathway, taking into account the direction set by current scientific knowledge. In the social area, we develop an organisation that provides employees with opportunities for growth, well-being, and an inclusive working environment. In governance, we strengthen ethical standards, compliance frameworks, and responsible management practices across the entire Group.

Our responsibility extends beyond our own organisation. Already today, 93 percent of the electricity used by the Group comes from renewable sources, and by 2030 we will significantly reduce emissions relative to 2025. Through our Invia DACH travel services, we will provide customers with CO₂e emissions data during their trips and offers from certified hotels, while our media outlets publish hundreds of articles on environmental topics each year. In this way, we reduce our own footprint while simultaneously helping users make informed choices. This is particularly important in the face of the challenges posed by climate change and economic transformation.

We remain committed to pursuing climate objectives developed in line with the Science Based Targets initiative and to conducting our business in accordance with the principles of the United Nations Global Compact. We believe that responsibility, transparency, and long-term thinking are the foundations of sustainable growth and business resilience.

I would like to thank all our employees, partners, and stakeholders who contribute to the realisation of our ambitions every day. I am confident that, through our collective commitment, we will continue to build WP Group as an innovative, responsible organisation that creates a positive impact on the world around us.



Elżbieta Bujniewicz-Belka
CFO Wirtualna Polska Holding



Our 2025 Impact



20 million

Internet Users

700+

Environmental Articles



4150 +

Total Workforce

8

CEE & DACH Markets

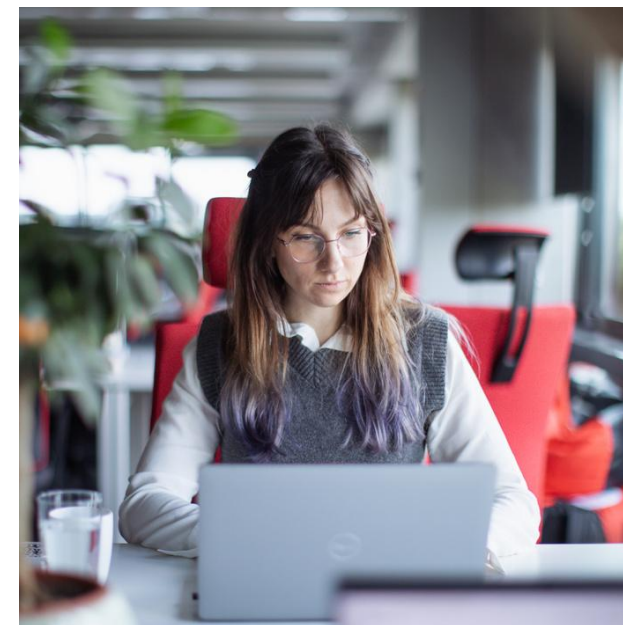


93%

Renewable Electricity

5 GWh

Annual Solar Generation



50%

Women on Boards

41%

Women in Senior Management

Empowering Informed Choices



We provide transparent and inclusive travel experiences

As a Group with leading tourism brands in our portfolio, we fully understand that planning a dream trip should be a process based on trust and positive emotions. Our overarching goal is to provide every customer with a stress-free, transparent and fair experience at every stage of searching and booking offers.

We want to ensure that regardless of the chosen method of contact with us – whether through modern digital platforms or in a traditional office – the customer receives a consistent price offer and access to the highest quality, reliable information that supports informed decision-making.



We empower society through independent media

As a leading media group, we believe that access to reliable, independent information is a fundamental right and a cornerstone of a free society. Our mission is to provide millions of users with objective, fact-based reporting that is free from external influence. By upholding the highest standards of editorial independence, we empower our audience to make informed decisions and actively participate in public life.

In an era of rising disinformation, our commitment to truth and pluralism is our greatest social responsibility. We combine this mission with a rigorous ethical framework for data management, ensuring that our platforms remain a safe and transparent space for public discourse.

Travel



TRAVEL · Strategic Directions



Travel

57% of Group EBITDA in 2025

ESG Dimensions

- Offer transparency
- Informed choices
- Service quality
- Digital Accessibility

Foreign Travel (Travel Packages)

Wakacje.pl · Travelplanet · Invia · Ab-in-den-urlaub

- **Market Share & Customer Loyalty**

Strengthen leading positions in organised travel across Poland, CEE, and DACH through scale, brand recognition, and operational efficiency. Invest in loyalty, repeat purchase and pre- and post-sale service.

- **Shift Toward Online**

Accelerate migration from offline to online sales channels in CEE (where offline sales remains structurally high), supporting margin expansion and scalability while maintaining omnichannel capabilities for complex products.

- **Scalable Regional Platform & Synergies**

Leverage shared technology, marketing know-how, procurement, and operational capabilities across markets to improve profitability and competitive positioning.

Domestic Travel (Accommodation)

Szallas Group · Nocowanie.pl (HU, CZ, HR, RO, PL)

- **Regional CEE Accommodation Platform**

Strengthen Szallas Group's position as a leading regional accommodation marketplace through organic growth, supply expansion, and platform monetization.

- **Product, UX & Monetization Optimization**

Continue improving platform functionality, mobile experience, pricing tools, and monetization capabilities to increase conversion, repeat usage, and profitability.

Ads & Subs



Ads & Subscription · Strategic Directions



Ads & Subs

36% of Group EBITDA in 2025

ESG Dimensions

- Data & Privacy
- Responsible AI
- Content Quality
- Digital Inclusion

Technology, Data & AI

- **First-Party Data, AI & Advertising Monetisation**

Scale WP Group's 1st-party data ecosystem across media, subscriptions, commerce, and travel while expanding AI-driven targeting, personalization, recommendation, pricing, and campaign automation capabilities to improve monetization efficiency and advertiser ROAS in a privacy-first environment.

- **Scalable AdTech & Self-Serve Ecosystem**

Further develop high-margin self-serve and performance-based advertising solutions while scaling WP's advertising network and technology partnerships.

User, Content & Product

- **Personalisation & User Engagement**

Accelerate growth of personalized content experiences across platforms and devices to increase reach, engagement, and monetization potential.

- **Premium Content & Trusted Media Brands & Video**

Invest in quality journalism, premium editorial formats, and trusted content brands to strengthen audience engagement and long-term user loyalty.

- **Subscription & Digital Product Expansion**

Grow recurring revenues through subscriptions, premium services, video, audio, and digital consumer products across the WP ecosystem.

Strategy & Trends

Group Strategy · Trends & Risks



Strategic Directions

- **Deepening focus on core growth engines**
Continue prioritizing the Group's highest-margin and most scalable verticals, with particular focus on advertising, subscription-based monetization, and travel services.
- **Leveraging marketing know-how across the Group**
Maximize synergies by scaling the Group's expertise in advertising and performance marketing across all business units. Use the Group's media reach and data capabilities as a competitive advantage for accelerating growth and improving operational efficiency.
- **Data, technology and AI as key enablers of growth**
Invest in AI, automation, and proprietary data capabilities to improve advertising effectiveness, personalization, operational efficiency, and customer experience across the Group.
- **M&A strategy to strengthen strategic positioning**
Pursue acquisitions of companies that enhance the Group's strategic capabilities, expand core verticals, or strengthen technological and commerce competencies.

Key Structural Trends & Risk Factors

- **Macroeconomic, consumer demand volatility & competition**
Advertising and travel demand remain sensitive to macroeconomic conditions, inflation, geopolitical developments, and competitive pressure across digital markets.
- **AI & technology investments**
AI and automation improve monetization and scalability, while requiring continued investment in infrastructure, platforms, and talent, impacting both OPEX and CAPEX.
- **Evolving media consumption patterns**
Competition for user attention continues to intensify across platforms and formats, increasing the importance of scale, strong brands, and ecosystem diversification.
- **AI-driven search evolution**
AI answers and zero-click search may pressure traffic acquisition, but WP's strong direct and organic audience base increases resilience and creates new monetization opportunities.
- **Regulatory Environment**
Evolving digital regulations increase compliance complexity, but may strengthen scaled players with trusted brands and proprietary data.

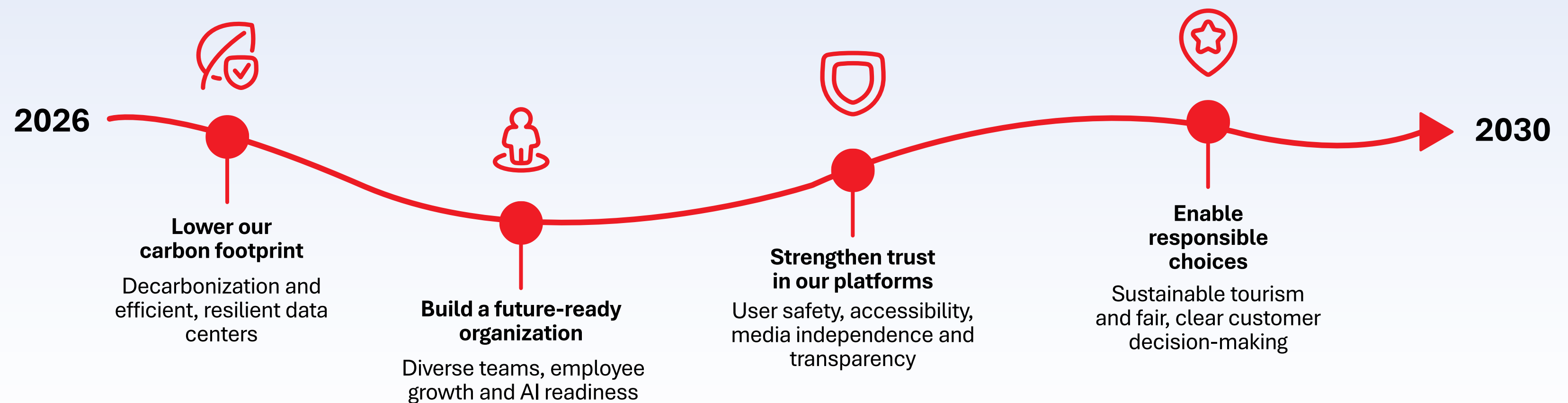
Our Sustainable Development Goal



We help people make informed decisions by providing reliable and accessible information, while supporting the sustainable growth of the Group.

WP's business model is built on trusted digital platforms that help users access information, compare options and make decisions across media, travel and consumer finance platforms.

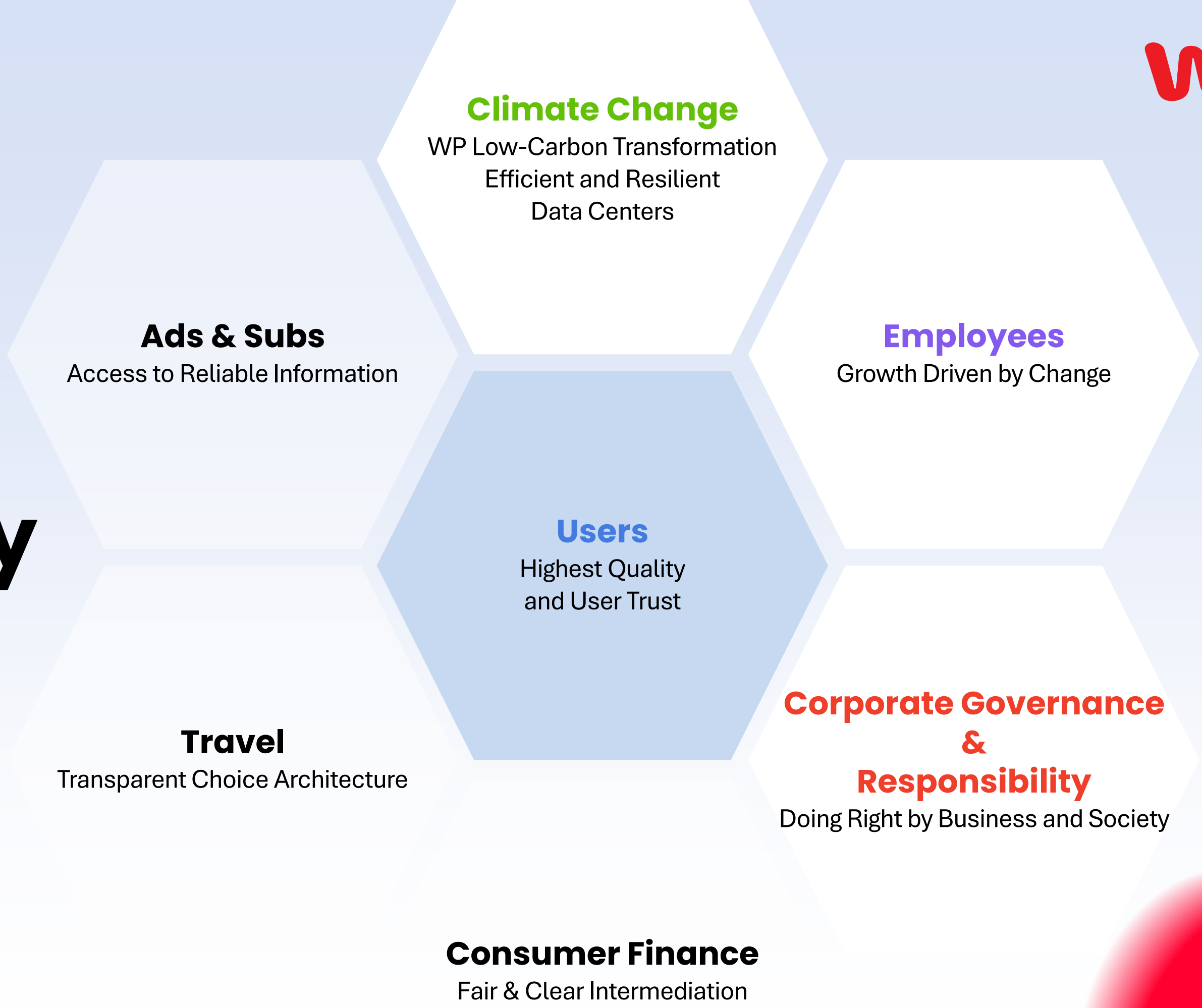
From 2026 to 2030, we will scale responsibly - lowering our footprint, building resilient operations, and helping users & partners make informed choices.



✓ **Result:** Lower negative impact, and an ethical, transparent, and resilient organization.



Our Sustainability Framework



Users

Highest Quality and User Trust





Empowering Informed Users

“We empower millions by providing safe, independent, and high-quality services. Our mission is to combine top-tier digital security with impactful journalism and responsible travel.”

TRAVEL EXCELLENCE & WELL-BEING

Building a strong travel offering that promotes rest and recovery. We enable our users to enjoy high-quality, verified, and transparent leisure offers.

MEDIA INTEGRITY & INDEPENDENCE

Safeguarding the credibility of our media operations. We act as a force for public good - raising awareness of social issues and holding institutions accountable.

CYBERSECURITY

Maintaining the highest standards of digital security. We protect our infrastructure and systems to ensure a safe and reliable environment for all our users.

DATA PRIVACY

Focusing on ethical data management and safeguarding user privacy. We are committed to transparency and protecting personal data across all WP platforms

Users Targets & KPIs

Objective

2030 Ambition

S.2.1: We provide a transparent, inclusive and accessible travel customer experience across all channels.

- Elevate customer satisfaction across all online and offline travel service channels.
- Drive digital innovation by expanding self-service tools and automation in after-sales.
- Expand our strategic franchise network to increase physical accessibility and ensure regional proximity.
- Support demographic inclusivity by maintaining stable service accessibility for the 50+ age segment.

Positive trend
across channels
NPS score

Expand digital
aftersales self-
service

~765
franchise locations
supporting offline
access

Stable Share of
customers aged
50+ via franchises

Objective

2030 Ambition

S.2.2: We promote independent and ethical media communication.

- Uphold high standards of user satisfaction regarding content quality and platform interactions.
- Actively monitor and elevate community engagement by systematically measuring user satisfaction with our comment sections and improving moderation quality
- Maximize media impact and reliability as measured by industry citation rates.
- Advance sustainability discourse by consistently publishing high-quality, sustainability-themed content.

Positive trend
in user satisfaction
scores (including
comment section
experience)

High impact
of citation and
media reach metrics

**Consistent
growth**
of media reach of
sustainability
articles

Users Targets & KPIs

Objectives

S.2.3: We ensure a high level of cybersecurity resilience.

- Expand group-wide security systems to ensure comprehensive coverage across all business entities.
- Foster a security-first culture through mandatory and continuous awareness training for all employees.
- Mitigate supply chain vulnerabilities by performing ICT supplier risk assessments.
- Leverage AI-driven technologies to enhance the speed and accuracy of incident classification.

S.2.4: We commit to ethical data management and user privacy protection.

- Maintain compliance with privacy standards through employee training programs.
- Optimize data protection workflows to minimize incident response times.
- Strengthen user trust by reducing the ratio of user complaints to supervisory authorities through enhanced transparent communication.
- Ensure universal accessibility of privacy policies across all Group platforms.

2030 Ambition

- 100%** Entities covered by unified security standards
- 100%** Employee training completion rate
- 100%** ICT suppliers assessed
- Continuous growth** of share of AI-classified incidents

- ~95%** Successful employee training completion rate
- Continuous improvement** of incident response time
- +3** accessibility formats (e.g., simplified language) per platform

Climate Change

WP's Low-Carbon Transformation





Decarbonizing Our Digital Future

“We are committed to reducing our carbon footprint by optimizing our digital infrastructure and empowering users to make sustainable choices through transparent data.”

DECARBONISATION PATHWAY

Continuing the decarbonization efforts of our operations and entire value chain.

EFFICIENT INFRASTRUCTURE

Maximizing renewable energy use and optimizing efficiency in our data centers.

CLIMATE GOVERNANCE

Ensuring the highest standards of data accuracy and climate reporting.

TRANSPARENCY IN TRAVEL CHOICES

In Invia Group, we empower informed choices through verified hotel certifications, trip-level CO₂ data, and contribution options



Climate Targets & KPIs



Objectives

2030 Ambition

E.1: We will reduce greenhouse gas emissions in line with a defined decarbonisation pathway.

- Further decarbonization of operational emissions through a full transition to renewable electricity and the reduction of remaining emissions in Scopes 1 and 2.
- Reducing value chain emissions through decarbonization actions in key areas of Scope 3.

- 100%** renewable electricity usage in our entire operations
- 25%** absolute reduction in Scope 1 (vs 2025)
- 15%** absolute reduction in Scope 3 (vs 2025)

E.2: We will improve energy efficiency and resilience of our data centers.

- Deploy advanced cooling and energy-management technologies to minimize Power Usage Effectiveness (PUE).
- Maintain a 100% renewable energy portfolio for all Data Center operations.

- 1,3** PUE target efficiency ratio
- 100%** Share of renewable energy in DCs

E.3: We will strengthen climate data, governance, and reporting processes

- Transition from industry-average estimates to primary data collection for Scopes 1, 2, and 3.
- Maintain and enhance our audit-proven GHG reporting and data management systems.

- Primary Data Priority (Scope 1 & 2)**
maximizing direct data collection for all core operations
- Estimation Reduction (Scope 3)**
moving towards primary data to increase reporting precision.

E.4: We will enable customers to make more sustainable travel choices

- Integrate verified third-party sustainability certifications into hotel offerings to empower eco-conscious customer decision-making.
- Share trip-level CO₂e emissions with customers.
- Establish dedicated sustainability landing pages for each travel brand.
- Publish educational content on sustainability across our travel platforms.

- 33%** Invia Group bookings with certifiable hotels
- 100%** DACH trips with CO₂e transparency
- 100%** brands with sustainability landing page
- 32** articles on sustainable travel yearly

People

Growth Driven by Change





Thriving Through Change



“Continuous listening is our foundation. By measuring engagement, we turn every voice into a source of organizational strength and resilience.”

1

ENGAGEMENT

Measuring engagement to build an anti-fragile organization. We prioritize psychological safety and well-being to foster resilience and growth through change.

2

LEARNING & AI READINESS

Future-proofing our teams for the digital age. We invest in continuous learning and AI-driven capabilities to stay ahead of the curve.

3

DIVERSITY, EQUITY & INCLUSION

Fostering an inclusive and fair environment. We are committed to achieving gender pay equity and promoting representative leadership.

Workforce Targets & KP



Objectives

S.1.1: We aim to foster a fair, transparent, and attractive workplace focusing on well-being

- Enhance organizational culture by systematically improving employee engagement scores.
- Prioritize mental and physical health through targeted initiatives to boost the overall well-being index.
- Optimize retention and talent management strategies to maintain a stable and healthy turnover rate. Measure, analyse and monitor voluntary leaves.

S.1.2: We enable continuous learning, growth and skill development

- Ensure equitable access to diverse learning and development (L&D) opportunities across the Group.
- Maximize internal mobility and career progression by increasing the share of vacancies filled by internal candidates.
- Accelerate digital transformation by providing comprehensive AI training.
- Embed sustainability into the corporate DNA by enhancing employee awareness of sustainability principles.

S.1.3: We aim to foster a diverse, equitable, and inclusive workplace

- Ensure pay equity by actively identifying and reducing the gender pay gap across all entities.
- Keep a high level of representation of women in senior leadership and decision-making roles.
- Utilize data-driven insights to measure and improve the Inclusion & Psychological Safety Index.
- Strengthen recruitment and onboarding processes to reflect the highest standards of DEI and unbiased hiring.

2030 Ambition

Positive trend – Engagement & well-being index (baseline establishment & annual growth)

15% maintained turnover rate

Continuous improvement of employee skills with an emphasis on AI skills

Increase in the share of vacancies filled by internal candidates

~70% Employees know what we stand for on sustainability

~5% Gender pay gap level

+40% Women in senior leadership position

Positive trend – Inclusion & Psychological Safety Index (commencement of tracking)

Governance

Highest Standards of Management
and Oversight



Integrity & Responsible Leadership

“We lead with integrity. By fostering a culture of transparency and accountability, we ensure sustainable growth and build lasting trust with all our stakeholders.”

GOVERNANCE & CORPORATE CULTURE

Maintaining the highest standards of transparency and risk management. We integrate ethical conduct into our daily operations to drive sustainable value across the Group.

TRUSTED PARTNERSHIPS

Promoting responsible cooperation with our suppliers and franchise partners. We strive to ensure ethical business practices and transparency across our entire value chain.



Governance Targets & KPIs



Objectives

G.1: We strengthen governance, compliance, and ethical business practices.

- Standardize and implement Group policies across all business entities.
- Ensure participation in mandatory ethics and compliance training for all employees.
- Ensure timely resolution of reported compliance violations within defined organizational timelines.
- Integrate ESG risks directly into the Group's business risk management framework.
- Deliver high performance across all Sustainability-Linked Loan (SLL) KPIs.

G.2: We aim to promote responsible and strong relationships with suppliers and franchise partners.

- Implement and enforce the Supplier Code of Conduct as a mandatory part of new contracts.
- Provide mandatory anti-corruption training to all of the workforce.
- Periodically measure and improve franchise partner satisfaction through a standardized NPS system.

2030 Ambition

- 100%** entities covered by WPH policies
- 100%** employees trained
- 100%** timely resolved incidents

- 90%** partners with CoC signed
- 100%** employees trained
- NPS** positive among franchises

Responsibility

Beyond the Screen

Corporate Social Responsibility

We extend our purpose far beyond digital platforms - funding real-world change each year, amplified by the reach of our media.



Our Track Record



At Wirtualna Polska, we believe that our responsibility extends far beyond computer and smartphone screens. Implementing social and environmental projects is a key element of our strategy – these are initiatives that bring real change to our surroundings and in which we have been involved with full conviction for many years. Every year, we allocate approximately 300,000 PLN to support these goals, additionally leveraging the reach of our websites and social media channels to provide these ideas with the necessary scale. Below, we present selected, ongoing initiatives that are particularly important to us:



Santa Claus for Seniors – The Letter Campaign

Residents of social welfare homes have written letters to Santa Claus expressing their needs and dreams. We, the donors, want to make these dreams come true.



Biodiversity protection

Wirtualna Polska is protecting another 2 hectares of forest in the Biebrza River Valley and a nest of the lesser spotted eagle. We have thus fulfilled our goal from the sustainable development strategy.



Protecting journalists

We have launched a program to protect and support our journalists – the Polish Army Shield. This is a concrete response to the increasing attacks on journalists, especially on social media.

Corporate Responsibility: Targets & KPIs



Objective

R.1: We invest in communities and social impact

- Create a long-term Corporate Social Responsibility strategy for the Group.
- Support charities and community organizations with social or environmental impact.
- Establish a transparent annual reporting cycle for philanthropic activities.

2030 Ambition

2027	Launch of Group Corporate Social Responsibility Strategy
>300k PLN	Annual budget
Annual	Reporting on Group's activities

We Participate in Responsible Initiatives



Global Compact
Network Poland

UN Global Compact is the world's largest initiative bringing together sustainable business.

WP membership since 2020.



A global initiative promoting diversity in business. The goal of 30% Club Poland is, among others, to increase women's representation at the board and supervisory board level in the 140 largest Polish listed companies by 2030.

WP membership since 2021.



KARTA RÓŻNORODNOŚCI
KOORDYNOWANA PRZEZ
FORUM ODPOWIEDZIALNEGO BIZNESU

An international initiative coordinated by the Responsible Business Forum to promote equal treatment policies and diversity management in the workplace.

WP membership since June 2022.



For any questions regarding this strategy, please contact:

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