

## Policy of counteracting undesirable phenomena such as discrimination, harassment, bullying and violence

### 1. Definitions

All definitions and the terms used in this document are in the dictionary. Additionally, for the purposes of the following policy, it should be understood:

- **Bullying** - actions and behaviors concerning a person, consisting in their persistent and long-term harassment or intimidation, causing an underestimation of their professional suitability, causing or aimed at humiliating or ridiculing, isolating or eliminating them from the team co-workers.
- **Discrimination** - a situation in which a person would, is or could be treated in a comparable situation less favorably than other persons, inter alia due to gender, age, disability, race, religion, nationality, political beliefs, trade union membership, ethnic origin, religion, sexual orientation, employment for a fixed or indefinite period, full-time or part-time employment.
- **Harassment** - undesirable conduct with the purpose or effect of violating the dignity of a person and creating an intimidating, hostile, degrading, humiliating or offensive atmosphere towards him, including sexual harassment understood as unwanted conduct of a sexual or gender-related nature: this behavior may be consist of physical, verbal or non-verbal elements.

### 2. Policy scope and purpose

2.1. The Company strives to create a friendly and unbiased work environment, in which people of different characteristics, views, beliefs, nationality and religion are employed and for which such people work.

2.2. The Company requires employees and other categories of workers (including service providers and their employees, consultants, suppliers, secondees, etc.), and in particular those holding managerial positions, to act responsibly and ethically towards employees and other such Company's stakeholders (as listed in this paragraph).

2.3. This Policy is established and adopted for the purpose of counteracting and preventing bullying, harassment, discrimination and violence (physical or psychological) in the Company, as well as building positive relations among employees and other Company's stakeholders.

### 3. Counteracting undesirable phenomena such as bullying, harassment, discrimination and violence

3.1. The Company does not accept bullying, harassment discrimination or any other forms of psychological and physical violence at work that may arise between persons performing work for the Employer (regardless of the legal basis for such work).

3.2. The Company actively prevents bullying, harassment, discrimination as well as other forms of psychological and physical violence at work.

3.3. Counteracting bullying, harassment and discrimination as well as other forms of mental and physical violence is carried out by the Company, in particular by:

- obliging the management to promote behaviors consistent with the principles of social coexistence and taking care of proper communication relationships in teams operating within the Employer,
- training managerial and employee staff, disseminating knowledge about the undesirable phenomena such as bullying, discrimination, harassment and violence, methods and ways of preventing their occurrence and the consequences of their occurrence,
- preventive measures taken as part of the ongoing management of employees and other Company's stakeholders, related in particular to the use, for employees, of systemic, objective criteria for assessing the effects of work under the employee appraisal system and open communication,
- promoting the principle of mutual respect in relations between all employed persons, including subordinates, superiors and other members and team, and other Company's stakeholders,
- investigating, condemning and sanctioning appropriately manifestations of undesirable phenomena or behaviors that may lead to such phenomena,
- activities integrating employees as part of allocating funds for training and integration trips, periodic meetings of employees outside the workplace and organizing joint events, as well as volunteering activities.

## 4. Obligations of employees and other Company's stakeholders

4.1. All employees and other Company's stakeholders are obliged to comply with the prohibition of undesirable phenomena such as bullying, discrimination, harassment and violence at work.

4.2. Employed persons and other Company's stakeholders are obliged to apply the principles of social coexistence in their mutual relations, show respect, kindness and courtesy guaranteeing order, as well as maintaining well-being and mental hygiene.

4.3. Employees and other Company's stakeholders are required to read and apply this Policy.

## 5. Reporting of adverse events such as bullying, discrimination, harassment or violence

5.1. Employees and other Company's stakeholders have the opportunity to report cases of bullying, discrimination, harassment and violence in accordance with the *Whistleblowing procedure*.

## 6. Sanctioning

6.1. Behavior constituting bullying, discrimination, harassment or violence is the basis for the Employer to apply sanctions and disciplinary actions up to and including termination of the employment contract or other contractual relationship, including without notice period.

6.2. Reporting made whereas the author knows or should have known that they are unjustified or false, and slandering other employees or Company's stakeholders, as well as acting in bad faith, is forbidden and constitutes a violation of basic employee obligations, which may be the basis for the Employer's use of sanctions and disciplinary actions up to and including termination of the employment contract or other contractual relationship, including without notice period, of the employee or other Company's stakeholder who has committed it, including without notice period.

## 7. Systemic measures to counteract the occurrence of undesirable phenomena, such as bullying, discrimination, harassment or violence - monitoring of employee relations

7.1. In order to prevent the occurrence of bullying, harassment, violence and discrimination, employee relations are monitored at the Employer.

The monitoring referred to above may consist, in particular, in:

- analyzing complaints, including reporting by employees or other Company's stakeholders of cases of discriminatory actions, bullying, harassment or violence,
- conducting anonymous surveys,
- analyzing the organizational structure of the Employer in order to eliminate the possibility of discriminatory actions, bullying, harassment or violence.

7.2. In HR policy programs, the Employer takes into account solutions aimed at reducing the level of risk related to the occurrence of bullying, harassment, discrimination or violence by the Employer.

## 8. Final provisions

This Policy constitutes an appendix to the Company's Work Regulations and its integral part.