

## POL-MET Sp. z o.o. – Human Rights and Working Conditions Policy

### Purpose and Scope

This Human Rights and Working Conditions Policy has been adopted by the management of POL-MET Sp. z o.o. (hereinafter the “Company”) to express its commitment to respecting and protecting human rights and ensuring decent working conditions for all employees, contractors, and business partners. The Policy is binding and covers all subsidiaries, organizational units, and suppliers.

The foundation of the Policy lies in international human rights standards, in particular:

- **Universal Declaration of Human Rights (UDHR)** – Article 23 provides that everyone has the right to work, to free choice of employment, to just and favorable conditions of work, and to protection against unemployment; everyone has the right to equal pay for equal work and to just and favorable remuneration ensuring a decent living for themselves and their family, as well as the right to form and join trade unions for the protection of their interests.
- **UN Guiding Principles on Business and Human Rights and the UN Global Compact** – providing frameworks for responsible business conduct.
- **International Labour Organization (ILO) Conventions** – including Convention No. 138 on minimum age (establishing the minimum age for employment and requiring states to adopt policies to eliminate child labor), Conventions No. 29 and 105 prohibiting forced labor, Conventions No. 87 and 98 on freedom of association and collective bargaining, and Conventions No. 155 and 187, which confirm that a safe and healthy work environment is a fundamental right.

### Core Commitments

#### Respect for Dignity and Non-Discrimination

- **Equality and non-discrimination** – The Company treats all employees and candidates equally, regardless of age, gender, sexual orientation, gender identity, ethnic origin, nationality, race, skin color, religion, political beliefs, health status, disability, or any other characteristics. In line with the UDHR, every human being is free and equal in dignity and rights, while ASGP requires suppliers not to tolerate any form of discrimination or harassment and to ensure equal employment opportunities.
- **Respect for dignity** – The Company provides a workplace free from violence, harassment, bullying, and all forms of degrading treatment.
- **Diversity and inclusion** – The Company promotes an inclusive culture and values diversity. According to ASGP, suppliers should develop and foster inclusive cultures in which everyone can fully participate and realize their potential.

#### Safe and Healthy Working Conditions

- **Right to a safe work environment** – In 2022, the International Labour Conference recognized a safe and healthy work environment as a fundamental element of labor rights; all member states are required to respect, promote, and realize this right. The Company commits to providing workplaces that meet or exceed national occupational health and safety regulations and industry standards.
- **Risk assessment and prevention** – The Company identifies and assesses hazards, implements preventive measures, and provides employees with appropriate OHS training. In case of an accident or incident, root cause analysis and corrective measures are conducted.
- **Protective equipment and training** – Where necessary, the Company provides employees with appropriate personal protective equipment and training on its use.
- **Emergency preparedness** – The Company develops emergency response plans and conducts regular drills.

## Fair Remuneration and Benefits

- **Equal pay for equal work** – The UDHR states that everyone has the right, without any discrimination, to equal pay for equal work. The Company ensures a remuneration system based on objective criteria (experience, competence, work results) and strives to eliminate pay disparities resulting from gender or other unlawful discrimination.
- **Fair remuneration and benefits** – According to the UDHR, every worker has the right to just and favorable remuneration ensuring an existence worthy of human dignity for themselves and their family. The Company complies with applicable regulations on minimum wage, overtime pay, paid leave, sick leave, and other benefits.
- **Transparency** – Wage conditions, bonus rules, and other benefits are communicated to employees clearly and comprehensibly.
- **Right to rest** – Everyone has the right to rest and leisure. The Company complies with regulations on maximum working hours, breaks, and leave, and avoids excessive overtime.

## Working Hours and Right to Organize

- **Working hours** – In accordance with ASGP, suppliers should comply with local laws and collective agreements regarding working hours, or in their absence, ILO standards on working time. The Company complies with labor law, keeps working time records, and pays due overtime.
- **Right to organize and collective bargaining** – The UDHR grants everyone the right to form and join trade unions to protect their interests. The Company respects employees' freedom to join trade unions, engage in collective bargaining, and communicate with management without fear of retaliation.
- **Social dialogue** – The Company supports dialogue with employee representatives and conducts negotiations in good faith on working and wage conditions.

## Prohibition of Child Labor

- **Minimum age of employment** – ILO Convention No. 138 requires countries to set a minimum age to effectively eliminate child labor. The Company does not employ persons under 18 for heavy or hazardous work and does not employ persons under 15 in accordance with Polish law.
- **Supply chain compliance** – ASGP requires suppliers to observe the minimum employment age across the supply chain. The Company requires suppliers and contractors to comply with this principle and verifies compliance during procurement processes.
- **Education and awareness** – The Company carries out educational activities on child protection and cooperates with social organizations when necessary.

## Prohibition of Forced Labor, Modern Slavery, and Human Trafficking

- **Voluntary work** – The Company does not tolerate any form of forced labor, slavery, debt bondage, or human trafficking. ASGP explicitly requires a ban on all forms of forced labor, including prison labor, trafficking, and retention of employees' identity documents.
- **Ethical recruitment** – Recruitment must be transparent and fair; employees are not charged recruitment fees, and their identity documents are not confiscated. Every employee receives a written contract in a language they understand.
- **Reporting processes** – The Company provides confidential channels for reporting coercion and promptly implements corrective measures.

## Freedom from Harassment and Bullying

- **Zero-tolerance policy** – The Company does not tolerate sexual harassment, bullying, psychological or physical violence, or other forms of harassment.
- **Training and awareness** – Training is organized for employees on the prevention of and response to harassment.

- **Grievance mechanism** – Complaints are handled confidentially, without retaliation, and with respect for the dignity of the complainants.

### Women's Rights and Gender Equality

- **Equal pay and promotions** – In line with ASGP, suppliers should ensure equal pay for equal work and equal employment opportunities for women. The Company is committed to promoting women at all organizational levels, including managerial positions.
- **Parent-friendly conditions** – The Company provides maternity, paternity, and parental leave in accordance with the law and supports employees in returning to work.
- **Protection from gender-based discrimination** – All forms of gender discrimination are prohibited; recruitment and employee evaluations are based on competence and performance.

### Minority and Local Community Rights

- **Respect for local communities** – The Company recognizes the right of local communities to decent living conditions, education, employment, and participation in decisions concerning the land and resources where it operates.
- **Prohibition of forced displacement** – The Company does not engage in forced evictions and avoids expropriations during project development.
- **Dialogue and consultations** – For projects affecting local communities, the Company conducts consultations and obtains "free, prior, and informed consent" (FPIC), where required by international standards.

### Supplier and Supply Chain Management

- **Supplier obligations** – The Company requires its suppliers to comply with this Policy and ASGP; suppliers must respect the human rights of employees, local communities, and other stakeholders and prevent violations.
- **Management systems** – Suppliers should implement human rights and working conditions management systems covering, among others, prohibition of child labor, fair remuneration, working time limits, prohibition of forced labor, freedom of association, and non-discrimination.
- **Grievance mechanism** – Suppliers should maintain an effective grievance mechanism consistent with UN Guiding Principle 31, enabling anonymous and confidential reporting of business ethics and human rights concerns.

### Responsibility and Oversight

- **Management** – The Management Board and company leadership are responsible for implementing this Policy, setting objectives, and monitoring progress.
- **Employees** – Employees are expected to be familiar with the Policy, participate in training, and report violations through designated channels.
- **Monitoring and audit** – The Company conducts regular internal and external audits to assess the Policy's effectiveness, legal compliance, and areas for improvement.
- **Policy review** – This Policy is reviewed at least once every two years or more frequently in case of changes in law, international standards, or organizational structure.

### Violation Reporting Mechanisms

The Company provides safe and confidential channels for reporting violations of this Policy. Reports may be submitted anonymously. The Company undertakes to conduct thorough investigations, protect whistleblowers from retaliation, and implement appropriate corrective actions.

#### Final Provisions

The Human Rights and Working Conditions Policy enters into force on the date of approval by the Management Board of POL-MET Sp. z o.o. and is publicly available. It is an integral part of the Company's management system and serves as a reference point for all operational procedures, decision-making, and stakeholder relations.

This document confirms the Company's commitment to building a culture based on dignity, fairness, safety, and responsibility.

Prezes Zarządu  
Piotr Polkowski

A handwritten signature in blue ink, appearing to be 'P. Polkowski', written over the printed name.

**POL-MET Sp. z o.o.**

Warszawa, Al. Niepodległości 124 lok. 8  
02-577 Warszawa  
NIP: 821-264-71-01, REG: 364690209  
KRS: 0000962541