



POLICY ON PREVENTING WORKPLACE BULLYING AND DISCRIMINATION WITHIN THE APATOR GROUP

1. PREAMBLE

Acting in accordance with Article 943(1) of the Act of 26 June 1974, the Labor Code (Dz.U. /Journal of Laws/ of 2025, item 277), (hereinafter referred to as: the Labor Code), which requires the prevention of workplace bullying, and to ensure compliance with the provisions of Article 183a and Article 94(2b) in conjunction with Article 111 and Article 94(10) of the Labor Code, this Policy on Preventing Workplace Bullying and Discrimination (hereinafter referred to as the "Anti-Bullying Policy") is hereby adopted by the companies of the Apator Group

The Anti-Bullying Policy is a set of rules and measures adopted by the Management Boards of Apator Group companies (hereinafter referred to as the "Employer"), aimed at preventing workplace bullying and all forms of discrimination, as well as providing support to individuals who have experienced workplace bullying or discriminatory conduct within Apator Group companies (hereinafter referred to as "Employees").

2. PURPOSE OF THE POLICY

The purpose of implementing the Anti-Bullying Policy is to:

- a) promote a safe and friendly work environment,
- b) foster appropriate attitudes and conduct, and minimise the risk of actions constituting workplace bullying and all forms of discrimination,
- c) inform Employees about their rights and obligations regarding the occurrence of undesirable conduct such as workplace bullying, discrimination, including harassment and sexual harassment,
- d) raise Employees' awareness regarding the identification of workplace bullying and all forms of discrimination,
- e) eliminate workplace bullying and discriminatory conduct,
- f) ensure that every Employee has the opportunity to report any irregularities and complaints related to negative occurrences in this area,
- g) establish rules for intervention in the event of workplace bullying or discriminatory conduct occurring at the workplace or in connection with work,



- h) provide assistance and protection to individuals who have experienced workplace bullying or discriminatory conduct, to those who report such conduct, to witnesses, and to others who support the victims of such conduct,
- i) foster a sense of responsibility among management and employees for effective communication and good cooperation among all employees of Apator Group companies.

3. DEFINITIONS

3.1. The Concept of Workplace Bullying

Workplace Bullying – hostile, destructive, unethical, verbal, visual, or physical conduct that is systematically repeated by an employer, supervisor, or group of employees, directed at an employee, consisting of persistent and long-term bullying or intimidation, including psychological or physical harassment, causing or likely to cause the employee to have a diminished sense of professional self-worth, resulting in or intended to humiliate or ridicule the employee, isolate them, or exclude them from the team of coworkers. The most common manifestations of workplace bullying include restricting the employee’s ability to speak, constantly interrupting the employee, humiliating the employee, threatening the employee, isolating the employee from the rest of the team, undermining the employee’s competence, spreading rumours about the employee, and assigning the employee with tasks that violate their dignity, including tasks that are degrading and pointless, or tasks below their skills and qualifications. Conduct can be classified as workplace bullying if it additionally meets the following criteria:

- a) the conduct is repeated – it is not a one-time or accidental act,
- b) the conduct is continuous and consistent,
- c) the conduct persists over a long period of time – the length of this period varies from person to person; it may be several weeks, months, or even years,
- d) the actions are deliberate, and the person engaging in workplace bullying is aware of what they are doing and understands the effects that such conduct can have on the target, and achieving these effects is precisely the mobber’s goal,
- e) the conduct is typically psychological harassment; it is much less frequently expressed as physical aggression,
- f) the actions cause the employee or coworker to underestimate their professional competence,
- g) they result in the humiliation or ridicule of the employee or coworker, isolating them or excluding them from the team.



3.2. The Concept of Discrimination

Discrimination – unequal treatment of employees with regard to the establishment and termination of employment, terms and conditions of employment, promotion, and access to training aimed at improving professional qualifications, especially on social status, or based on any other status, in particular: trade union activity and personal characteristics such as age, disability, pregnancy, marital status, sexual orientation, or HIV status, as well as on the basis of fixed-term or indefinite-term employment, full-time or part-time work, or remote work, or due to the form of work performance.

A distinction is made between indirect and direct discrimination:

a. Direct discrimination – occurs when a person is treated less favourably than another person in a similar situation, based on an objective criterion or characteristic (e.g., sex, age, disability, race, religion, nationality, political beliefs, worldview, union membership, ethnic origin, religion, sexual orientation, fixed-term or indefinite-term employment, full-time or part-time work, or remote work arrangements, etc.)

b. Indirect discrimination – occurs where an apparently neutral, non-discriminatory criterion results in a particular person or group of people being placed at a disadvantage compared to others due to an apparently objective criterion (e.g., gender, age, sexual orientation, etc.).

Discrimination may be ongoing or a one-time occurrence.

Discrimination may take the form of harassment or sexual harassment.

3.3. The Concept of Harassment

Harassment – a form of employment discrimination, unwanted conduct whose purpose or effect is to violate an employee's dignity and create an intimidating, hostile, degrading, humiliating, or offensive environment for the employee based on an unacceptable discriminatory criterion (for example: gender, age, disability, race, religion, nationality, political beliefs, union membership, ethnic origin, creed, sexual orientation, fixed-term or indefinite employment, full-time or part-time employment).

The most common examples of harassment include malicious comments, name-calling, mocking, ridicule, and laughing at an employee; spreading rumours about an employee; and unwanted conduct by a supervisor or another employee with



sexual undertones, including demands or requests for sexual Favors or other conduct with sexual undertones, expressed verbally or nonverbally. This applies to situations where the rejection of such conduct by the employee toward whom it is directed affects or may affect decisions regarding their promotion, changes in working conditions or pay, salary, scope of duties, referral to training, or performance evaluation. The undesirable conduct described above is also considered sexual harassment if it has sexual undertones, violates standards of decency, and disrupts or prevents the performance of official duties, or creates an environment of intimidation, hostility, or humiliation.

Sexual harassment – a form of gender-based discrimination; examples include sexual harassment, in particular unwanted advances toward an employee, violation of physical integrity (e.g., pinching, groping, touching, kissing), making sexual proposals, the acceptance of which would entail a favourable change in the employee's terms of employment, ambiguous comments and jokes of a (e.g., regarding the employee's appearance or sexuality), distributing pornographic material (for example, hanging up erotic calendars, sending erotic photos), using vulgar, sexually suggestive language, and habitually complimenting an employee's appearance.

4. RIGHTS AND OBLIGATIONS OF EMPLOYEES AND EMPLOYERS

4.1. The employer is obligated to take all measures permitted by law, including those described in this procedure, to prevent workplace bullying, discrimination – including harassment and sexual harassment – in the workplace or in connection with the work performed by employees, and to mitigate the social effects of workplace bullying and all forms of discrimination, and in particular to intervene and help victims of these phenomena.

4.2. The employer is obligated to respond to all instances of workplace bullying, discrimination, and its various forms, and to initiate appropriate measures to permanently eliminate them, while maintaining due discretion.

4.3. The employer is obligated to take the actions described in the procedure in every instance where a report of workplace bullying or discriminatory conduct is filed in accordance with the procedure outlined in the Anti-Bullying Policy, as well as in every instance where information regarding the occurrence of workplace bullying, discrimination, or its various forms from a source other than a report, particularly when such information arises from periodic employee evaluations, surveys, or other sources.



4.4. Any Employee who is subjected to workplace bullying or discriminatory conduct has the right to demand that the employer take measures to eliminate such conduct and its effects.

4.5. Any Employee who has or becomes aware of instances of workplace bullying, discrimination, or related forms of discrimination is entitled to file a report.

4.6. Employees, regardless of their position, are required to treat one another with dignity and respect, and to ensure that their words or conduct do not infringe upon the rights and interests of others.

4.7. Employees are required to prevent workplace bullying and all forms of discrimination by:

- making efforts to apply the principles of social coexistence in their relationships with other employees, including respect for their dignity and personal rights;
- avoiding undesirable conduct in the workplace toward employees or other individuals, particularly conduct leading to workplace bullying and discrimination;
- responding to undesirable conduct by third parties, particularly conduct leading to workplace bullying and discrimination;
- refusing to participate in or support actions that involve undesirable conduct, particularly behaviour leading to bullying and discrimination or violating the principles of social coexistence;
- avoiding conflicts, the escalation of conflicts, and making efforts to resolve conflicts at the earliest possible stage of their development.

5. COMBATING WORKPLACE BULLYING AND ALL FORMS OF DISCRIMINATION

The Employer takes concrete action against workplace bullying and all forms of discrimination in the workplace and in connection with work, particularly by:

- implementing this Anti-Bullying Policy and communicating it to Employees, as well as regularly and consistently reminding Employees and colleagues of the need to comply with it;
- establishing a well-defined organisational structure that, in a standardised manner, defines the types and hierarchy of positions, sets equal requirements for individuals employed in a given position, and specifies the salary range applicable to that position, as well as the system of salary supplements and bonuses;



- ensuring that the recruitment, hiring, or promotion processes apply no requirements that would be deemed discriminatory – in particular, making employment or promotion contingent on age, gender, marital status, etc. – and that all decisions in this area will be made in accordance with the procedures adopted by the organisation, with the involvement of individuals responsible for verifying the decisions made (involvement of the HR department, approval by top management, etc.);
- ensuring that individuals receive equal pay for equal work, with the proviso that factors such as length of service, skills, or experience may influence pay differentiation within the specified pay ranges;
- assessing the situation within the company at least once every two years by conducting anonymous surveys among employees, covering the issues specified in this Anti-Bullying Policy;
- conducting informational, training, and advisory activities for management and employees/colleagues regarding basic knowledge on the subject of harassment and discriminatory practices (at least once a year);
- taking preventive measures aimed at counteracting workplace bullying and discrimination, particularly by creating and making available to employees informational materials on workplace bullying, discrimination and its types, as well as other undesirable conduct;
- intervening to immediately put an end to workplace bullying, discrimination, and its various forms.

6. REPORTING VIOLATIONS RELATED TO WORKPLACE BULLYING AND DISCRIMINATION

6.1. Any Employee who believes they have been subjected to workplace bullying or discrimination, as well as anyone who witnesses such actions, should report the violation by:

- sending an email to: compliance@apator.com,
- submitting a written report to the HR department of the relevant Employer.

6.2. The report of the violation should include:

- the reporter's identifying information,
- a description of the actions or conduct that are unlawful,
- the name of the person who committed the workplace bullying or any form of discrimination,
- the name of the Employer's organisational unit where the violation occurred,



- the date or period of the incident (if determinable),
- any other information that may serve as evidence to corroborate the circumstances described in the report,
- information about any witnesses to the described events.

6.3. Complaints must be signed by the relevant Employees.

6.4. No Employee or associate who, in accordance with this Anti-Bullying Policy, reports acts of workplace bullying or discrimination, or who has provided any form of support to a victim, may suffer any negative consequences as a result.

6.5. All actions taken in response to reports of violations are conducted in accordance with the principles of confidentiality and impartiality, which apply to all participants in such proceedings.

6.6. Access to the personal data of the person reporting violations via the compliance@apator.com email address is restricted to the Compliance Team.

6.7. Within 7 business days of receiving the information, the Employer must, in each case, appoint an Anti-Bullying Committee, hereinafter referred to as the Committee, whose task is to determine whether the report is justified.

6.8. The Committee consists of at least three members. The Committee includes: a representative of the employer, representatives of labour unions (if any exist at the Employer's workplace), and a legal advisor. The members of the Committee elect a chairperson from among themselves.

6.9. Each member of the Committee is required to remain objective and impartial when assessing specific cases.

6.10. The Committee's work, meetings, and investigative interviews, as well as all documents related to the situation under investigation and the Committee's work, are confidential. The employer authorises Committee members to process the personal data of individuals participating in the proceedings.

6.11. After hearing the statements of the affected employee and the alleged perpetrator(s) of workplace bullying or discriminatory actions, and after conducting the evidentiary proceedings, including the examination of witnesses, the Committee



must decide by a simple majority vote on the merits of the complaint under consideration.

6.12. Minutes are taken of the Committee's meeting and signed by all members of the Committee and the parties to the proceedings. The Committee's proceedings are confidential.

6.13. The report may also include the team's suggestions for improving communication within a specific organisational unit at the employer's company, streamlining management, as well as the need to conduct additional explanatory and/or disciplinary interviews, or additional training and other initiatives aimed at improving relationships and standards of conduct in the workplace.

6.14. Decisions (including organisational and/or personnel decisions) regarding the situation assessed by the Committee and described in the notice must be made by the Employer – after reviewing the Committee's minutes.

6.15. In matters not covered herein, the proceedings before the Committee must be governed by the relevant provisions of the Code of Civil Procedure.

7. PREVENTION OF WORKPLACE BULLYING AND ALL FORMS OF DISCRIMINATION

- Any Employee who believes they have been subjected to workplace bullying or discrimination, or who witnesses such actions, should report the violation via the email address compliance@apator.com.

- The Employer actively combats workplace bullying and all forms of discrimination in the workplace and in connection with work, particularly by:

- implementing and communicating this Anti-Bullying Policy to Employees and regularly and consistently reminding Employees and colleagues of the need to comply with it;

- establishing a well-defined organisational structure that, in a standardised manner, defines the types and hierarchy of positions, sets equal requirements for individuals employed in a given position, and specifies the salary range applicable to that position, as well as the system of salary supplements and bonuses;

- ensuring that the recruitment, hiring, or promotion processes do not include requirements considered discriminatory, in particular, making employment or promotion contingent on age, gender, marital status, etc., and that all decisions in this regard are made in accordance with the procedures adopted by the organisation, with the involvement of individuals responsible for verifying the



decisions made (involvement of the HR department, approval by top management, etc.);

- ensuring that individuals receive equal pay for equal work, provided that factors such as length of service, skills, or experience may influence pay differentials within the pay ranges specified in accordance with the established guidelines;

- assessing the situation within the company at least once every two years by administering anonymous surveys among employees, covering the issues specified in this Anti-Bullying Policy;

- conducting informational, training, and advisory activities for management and employees/colleagues regarding basic knowledge about workplace bullying and discriminatory practices (at least once a year);

- taking preventive measures aimed at counteracting workplace bullying and discrimination, particularly consisting of creating and providing employees with informational materials on workplace bullying, discrimination and its various forms, and other undesirable conduct;

- intervening to immediately put an end to workplace bullying, discrimination, and its various forms.

8. REPORTING VIOLATIONS RELATED TO WORKPLACE BULLYING AND DISCRIMINATION

8.1. Any Employee who believes they have been subjected to workplace bullying or discrimination, as well as anyone who witnesses such actions, should report the violation by:

- sending an email to: compliance@apator.com,
- submitting a written report to the HR department of the relevant Employer.

8.2. The report of the violation should include:

- the reporter's identifying information,
- a description of the unlawful actions or conduct,
- the name of the person who engaged in workplace bullying or any form of discrimination,
- the name of the Employer's organisational unit where the violation occurred,



- the date or period during which the incident occurred (if determinable),
- other information that may serve as evidence to corroborate the circumstances described in the report,
- information about any witnesses to the described events.

8.3. Complaints must be signed by the relevant Employees.

8.4. No Employee or associate who reports acts of workplace bullying or discrimination in accordance with this Anti-Bullying Policy, or who has provided any form of support to the victim, may suffer any adverse consequences as a result.

8.5. All actions taken in response to reports of violations are conducted in accordance with the principles of confidentiality and impartiality, which apply to all participants in such proceedings.

8.6. Access to the personal data of the person reporting violations via the email address compliance@apator.com is restricted to the Compliance Team.

8.7. The employer must, in each case, within 7 business days of receiving the information, appoint an Anti-Bullying Committee, hereinafter referred to as the Committee, whose task is to determine whether the report is justified.

8.8. The Committee consists of at least three members. The Committee is composed of a representative of the employer and representatives of the labour unions (if any exist at the employer's workplace), and a legal advisor. The members of the Committee elect a chairperson from among themselves.

8.9. Each member of the Committee is required to remain objective and impartial when evaluating specific cases.

8.10. The Committee's work, meetings, and investigative interviews, as well as all documents related to the situation under investigation and the Committee's work, are confidential. The employer authorises Committee members to process the personal data of individuals participating in the proceedings.

8.11. After hearing the statements of the affected employee and the alleged perpetrator (or perpetrators) of workplace bullying or discriminatory actions, and after conducting the evidentiary proceedings, including the examination of



witnesses, the Committee must decide by a simple majority vote on the merits of the complaint under consideration.

8.12. Minutes are taken of the Committee's meeting and signed by all members of the Committee and the parties to the proceedings. The Committee's proceedings are confidential.

8.13. The minutes may also include the team's suggestions regarding improvements to communication within a specific organisational unit at the employer's premises, streamlining management, as well as the need to conduct additional explanatory and/or disciplinary interviews or additional training and other initiatives aimed at improving workplace relations and standards of conduct.

8.14. Decisions (including organisational and/or personnel decisions) regarding the situation assessed by the Committee and described in the notice must be made by the Employer – after reviewing the Committee's report.

8.15. In matters not covered by these provisions, the proceedings before the Committee must be governed by the relevant provisions of the Code of Civil Procedure.

9. LIABILITY FOR WORKPLACE BULLYING AND DISCRIMINATION

9.1. If the information provided in the report is found to be true and it is determined that the described actions constituted workplace bullying or discrimination, the Employer imposes sanctions against the perpetrator(s) of workplace bullying and discriminatory actions as provided for by labour law. In particular:

- the Employer may issue a warning or reprimand,
- the perpetrator of workplace bullying or discriminatory actions may additionally be deprived of the right to a reward or bonus for a period determined by the employer,
- in cases where workplace bullying or discrimination is established, the employer may terminate the employment relationship with the perpetrator due to reasons attributable to the employee, with notice or through disciplinary proceedings,
- may hold the employee financially liable for damage caused to the employer in connection with workplace bullying and discrimination;



9.2. The employer may transfer an affected employee – a victim of workplace bullying or discrimination – to another position at the employee’s request or with the employee’s consent. The transfer is possible provided that the technical and organisational conditions optimal for making such a decision are met.

9.3. If the information presented in the report is determined not to constitute workplace bullying or discrimination, the Employer must take measures aimed at eliminating the identified irregularities and preventing their recurrence.

10. FINAL PROVISIONS

10.1. All persons authorised to handle matters related to workplace bullying or discrimination are required to maintain confidentiality regarding all facts learned in the course of their work and in connection with such matters. Before commencing their work, they must sign a statement containing a confidentiality agreement.

10.2. Except for the parties concerned, who must be provided with copies of the requested documents upon their request, Committee members may not copy for sharing, nor in any way make available or disseminate any documents concerning a given case of workplace bullying or discrimination or concerning the Committee’s work. Furthermore, no document relating to a given case of bullying, discrimination, or the Committee’s work may be copied or made available to witnesses.

10.3. Data contained in the Committee’s materials and documents may be classified as special-category data – in which case it is subject to the appropriate safeguards provided for in the regulations on the protection of personal data.

10.4. This Anti-Bullying Policy is an internal document that forms part of the set of policies and procedures in force internally at the Employer, although it does not preclude the application of generally applicable laws.

10.5. With regard to the handling of internal reports, in matters not covered by this Anti-Bullying Policy or in the event of specific situations requiring an individualised approach, the decision – including regarding any exceptions applied – must be made by the Employer.

10.6. Any deviations from this Anti-Bullying Policy applied during the process of reviewing a report must be appropriately noted in the report registry, which should be maintained by each Employer.



10.7. Any amendments to this Anti-Bullying Policy must be made by the Employer at least once a year, as well as in the event of changes to labour law or the Employer's organisational structure.



Aparator SA with its registered office in Toruń entered in the National Court Register under no. 0000056456, Company's documents are stored at: District Court in Toruń, 7th Economic Division of the National Court Register, Share Capital of PLN 3.264.707,30 paid-up in full. Management Board: President – Maciej Wyczesany, Member of the Executive Board – Łukasz Zaworski, address of the headquarters: Gdańska 4A lok. C4, 87-100 Toruń, Poland, main address of business activity, address for correspondence: Ostaszewo 57C, 87-148 Łysomice, Poland, tel. +48 56 61 91 111, fax +48 56 61 91 274, e-mail: apator@apator.com, Tax Identification Number PL-879-016-68-96, REGON 870037630, BDO: 000003377, other addresses of business activity: ul. Wólczajska 125, 90-521 Łódź, Poland; Ostaszewo 57I, 87-148 Łysomice, Poland