



THE VALUE OF
SPECIALIZED TALENTS

RESOLUTION

of the Management Board of ANTAL Sp. z o.o.

of 2 September 2024

Preamble

As part of its ongoing business activities, the Management Board of ANTAL Sp. z o.o. has decided to implement the Code of Ethics and the Anti-Bullying and Anti-Discrimination Policy.

§ 1

The following documents are hereby introduced at ANTAL Sp. z o.o.:

the Code of Ethics of ANTAL Sp. z o.o., constituting Appendix No. 1 to this Resolution;

the Anti-Bullying and Anti-Discrimination Policy of ANTAL Sp. z o.o., constituting Appendix No. 2 to this Resolution.

§ 2

All employees and associates of ANTAL Sp. z o.o., irrespective of their position, form of engagement or branch in which they work, are required to familiarise themselves with, and comply with, the documents referred to in § 1 above.

All employees and associates of ANTAL Sp. z o.o., irrespective of their position, form of engagement or branch in which they work, are required to participate in training organised

by the Compliance Specialist concerning the application of and compliance with the documents referred to in § 1 above.

§ 3

This Resolution shall enter into force on 2 September 2024.

CODE OF ETHICS OF ANTAL Sp. z o.o.

(hereinafter referred to as the “Code”)

Introduction

At ANTAL Sp. z o.o., we conduct our business in an ethical and lawful manner because, by maintaining the reputation of an entity that complies with the law, we retain the trust of our clients and cooperating entities. The Code addresses the key matters which help safeguard ANTAL Sp. z o.o.

The Code presents the values and principles which are particularly important to the business activities of ANTAL Sp. z o.o. and sets out what we expect from you.

Who does the Code apply to?

The Code is binding at ANTAL Sp. z o.o. The ethical standards contained in the Code apply to all employees and associates, irrespective of their position, form of engagement or branch in which they work.

You are accountable for failure to comply with the Code. You may be subject to disciplinary action, lose your job or incur criminal liability.

Any failure to comply with the Code may also have consequences for the Company. The Company may be sued, fined or subject to an investigation. The Company's reputation may also be damaged.

Unsure how to apply the Code?

First and foremost, read the Code and understand what is expected of you. If you still have doubts about how to proceed, are unsure whether your decision is lawful or ethical, or whether it may expose the Company to reputational damage, you must report this to your immediate manager.

Our principles

I. Relationships with others

1. Mutual respect and non-discrimination

At ANTAL Sp. z o.o., we respect one another. We base workplace relationships and relationships with our business partners on cooperation, collegiality, assistance and the sharing of experience and knowledge. We do not tolerate unacceptable conduct.

Our workforce is diverse and we expect compliance with applicable anti-discrimination legislation. We avoid discrimination against employees and third parties on the grounds of race, sex, age, nationality, ethnic origin, skin colour, political views, sexual orientation, religious beliefs, social origin or disability.

What do we expect from you?

- Treat everyone with due respect.
- Seek to behave in a manner that does not offend anyone.
- Do not abuse, threaten or intimidate anyone.
- Do not remain indifferent if you witness discrimination or if you are discriminated against.

2. Healthy, safe and hygienic working conditions

To ensure that our working environment meets occupational health and safety requirements, compliance with safety guidelines is our overriding priority when planning and carrying out our tasks. This approach enables us to prevent workplace accidents and work-related illnesses to a significant extent.

What do we expect from you?

- Take responsibility for both your own safety and the safety of others.
- Minimise health and safety risks.
- Respond to harmful conduct and report hazards.
- Follow safety guidelines.
- Use personal protective equipment.
- If you hold a managerial position, ensure that your subordinates have received occupational health and safety training.

3. Environmental compliance

We attach great importance to ensuring that our activities comply with generally applicable environmental protection legislation.

What do we expect from you?

- Develop a deeper understanding of global sustainable development and biodiversity protection issues.
- Take environmental protection initiatives in your everyday life and at work.
- Comply with environmental protection legislation.
- Follow instructions concerning the use of chemicals.
- Exercise caution when handling materials or waste which may pose a health risk or are corrosive, flammable or explosive.

4. Working time and remuneration

At ANTAL Sp. z o.o., we comply with labour law and apply regulations concerning working time, rest periods, remuneration and benefits. We recognise, in particular, that employees' working time must not exceed the permitted maximum; employees are entitled to rest time and paid annual leave; and remuneration must meet minimum wage requirements.

What do we expect from you?

We make every effort to ensure that the terms and conditions of your work are clear to you. If you have any doubts concerning the terms of your engagement, ask your immediate manager for clarification and guidance.

5. Modern slavery and child labour

There is no place for modern slavery at ANTAL Sp. z o.o. We do not force anyone to work against their will or to work in repayment of a debt. There is also no place for human trafficking. ANTAL Sp. z o.o. does not permit the employment of children. We do not assign hazardous work or work posing a risk to others to young workers.

What do we expect from you?

- Do not use or support any form of modern slavery.
- If you hold a managerial position, ensure that your subordinates have made a voluntary decision to take up employment. Respect an employee's decision to leave employment in accordance with the law.
- If you hold a managerial position and recruit employees, remember to comply with legislation concerning the minimum working age.

6. Social media ethics

At ANTAL Sp. z o.o., we use social media platforms as tools for promoting our activities and maintaining closer contact with clients. Social media enable us to build a professional employer profile by posting comments and sharing content. We may also monitor information about the employer online. ANTAL Sp. z o.o. does not tolerate online hate speech. Every statement we make is substantive and intended to achieve a positive outcome. When posting online content, we respect privacy and the diversity of others' views, and we act in accordance with personal data protection legislation.

At ANTAL Sp. z o.o., we respect the decisions of our employees and associates as to whether or not to maintain a private social media profile.

What do we expect from you?

- Use your private social media profile in a way that respects the reputation of ANTAL Sp. z o.o. and of its employees, associates, business partners, clients, suppliers and competitors.
- If your statements may objectively expose ANTAL Sp. z o.o. to harm or damage its reputation, for example due to a breach of law or ethical principles, you may face consequences. ANTAL Sp. z o.o. has the right to protect its reputation and, to the extent that your activity affects the reputation of ANTAL Sp. z o.o., to intervene in your online activity, including activity on your private profile.
- Your activity must not disclose confidential information, portray ANTAL Sp. z o.o. in a negative light as a result of your controversial statements on social, political or moral issues, or associate ANTAL Sp. z o.o. with unwanted initiatives.
- When acting on behalf of ANTAL Sp. z o.o., remember to use appropriate language and, in particular, avoid posting comments generally regarded as offensive.
- If you decide to include information about ANTAL Sp. z o.o. on your profile, for example by stating the position you hold in the organisation, you must take into account that some of your private statements may be understood as statements made by ANTAL Sp. z o.o., or at least as statements approved by ANTAL Sp. z o.o.
- If you are an employee, remember your duty of loyalty to your employer. Consider whether promoting competitors' initiatives or marketing events breaches that duty.

Consider whether you should refrain from “liking” or reviewing the activities of clients, business partners or other employees.

- If you decide to criticise your employer online, ensure that your statement is factually accurate, does not offend other employees or associates, and is constructive, substantive and balanced.
- Remember to comply with generally applicable personal data protection legislation.

II. Integrity and legal compliance in the business activities of ANTAL Sp. z o.o.

1. Anti-corruption and anti-bribery

At ANTAL Sp. z o.o., we do not tolerate bribery or corruption. We do not participate in practices that disrupt free competition; we do not breach the law; we ensure fair competition; and we protect ourselves against bribery in order to build trust in ANTAL Sp. z o.o. Our conduct is based on integrity. We neither offer nor accept bribes, kickbacks or inappropriate gifts. We do not tolerate suppliers or business partners who act contrary to these principles. Where such conduct is identified, we take appropriate action.

What do we expect from you?

- Do not give or accept anything that could be regarded as a bribe. In particular, you must not offer or accept money or cash equivalents, such as gift cards, without legitimate justification. You must not accept favours, promises to release you from a debt, or other gifts and entertainment where these are contrary to the law or the principles of ANTAL Sp. z o.o.
- Accurately record all payments and transactions in the books and records of ANTAL Sp. z o.o.
- Do not pay bribes through suppliers or business partners of ANTAL Sp. z o.o.
- Limit business contact with public officials to activities permitted by applicable law.
- If accepting anything from a supplier or business partner could in any way affect the objectivity of your business decision, do not accept the offer and report the matter to your immediate manager.

2. Prevention of money laundering

Money laundering is most commonly carried out by overstating business income, creating sham transactions and subsequently introducing illegal funds into circulation. Illegal funds

may originate from various sources, such as human trafficking or fraud. ANTAL Sp. z o.o. neither participates in nor supports money laundering.

What do we expect from you?

- Before entering into a transaction with a client, examine its terms and look for indicators that may point to money laundering.
- Pay attention when a client pays cash for a large quantity of products or services. Report such situations to your immediate manager.
- You may accept or make cash payments only up to the limit permitted by applicable legislation.

III. Private interests and business activities

1. Conflicts of interest

At ANTAL Sp. z o.o., we perform our tasks and duties impartially. We treat everyone equally and respect their right to privacy and dignity. We act primarily in the interests of the Company. We avoid conflicts of interest so that our personal interests do not conflict with our professional duties. In this way, we make decisions in the best interests of our clients and suppliers and increase their trust in ANTAL Sp. z o.o.

What do we expect from you?

- Report conflicts of interest relating to your private affairs to your immediate manager. Your immediate manager may decide to exclude you from tasks and duties which may give rise to reasonable doubts as to whether you are acting fairly and in the interests of the Company.
- Potential conflicts may arise where:
 - *you have a close relationship with a subordinate or a job applicant;*
 - *outside work, you run a business which overlaps with the scope of activities of ANTAL Sp. z o.o.;*
 - *while employed by a company belonging to ANTAL Sp. z o.o., you undertake additional work for a competitor, supplier or business partner of ANTAL Sp. z o.o.;*
 - *a member of your family, such as your spouse, partner, sibling, parent, child or grandchild, starts work for a competitor, supplier or potential client; or*

- *a member of your family is a significant shareholder in a client, supplier, competitor or potential client.*
- If you hold a managerial position, you may seek the support of the Legal Department when resolving a conflict of interest reported by a subordinate.

2. Political activity

ANTAL Sp. z o.o. is neutral with regard to political parties and candidates for public office. Our assets may not be used to promote the interests of political parties or candidates for public office.

What do we expect from you?

- In your own name and using your own time and resources, you may support any cause, raise funds for political organisations or promote candidates for political office.
- You must not make contributions to any activity using the funds of, or on behalf of, ANTAL Sp. z o.o. You must not pursue your private political interests during working time or using the funds or resources of ANTAL Sp. z o.o.

IV. Protection of assets and trade secrets

1. Protection of assets

Assets include, in particular, tangible assets such as equipment and buildings, as well as funds, intellectual property, trade secrets and confidential information. At ANTAL Sp. z o.o., we take particular care to protect them because they represent essential value to the Company.

What do we expect from you?

- Protect the assets of ANTAL Sp. z o.o. Asset protection means safeguarding them against damage, destruction or loss and preventing their disclosure to unauthorised persons. Assets must not be sold, lent or otherwise transferred to unauthorised persons, nor altered in a way which affects their value, unless a manager gives approval for business reasons.

2. Protection of confidential information and trade secrets

At ANTAL Sp. z o.o., we protect:

-internal information, i.e. non-public information whose disclosure may affect the financial condition or reputation of the Company. Such information includes, for example, the acquisition or disposal of Company assets, the insolvency of key business partners, sudden changes in the Company's financial results, court disputes or proceedings conducted by public authorities;

-confidential information, i.e. all information not intended for public disclosure concerning processes, products, services, innovations, strategic plans and financial plans;

-trade secrets, i.e. technical, technological or organisational information of the undertaking, or other information having economic value for ANTAL Sp. z o.o., in respect of which ANTAL Sp. z o.o. has taken the necessary measures to keep it confidential.

What do we expect from you?

- Do not disclose or use internal information of ANTAL Sp. z o.o.
- Do not obtain information unlawfully or dishonestly.
- Without appropriate authorisation and a business purpose, do not disclose confidential information or trade secrets to persons outside the Company.
- Where confidential information originates from suppliers or business partners of ANTAL Sp. z o.o., comply with the relevant agreement in relation to the use and disclosure of that information.
- If discussing information is necessary, do so in the workplace.
- The duty to protect information applies throughout the period of employment and continues for three years after the end of cooperation with the Company.

3. Personal data protection

At ANTAL Sp. z o.o., we respect the fundamental rights and freedoms of natural persons, in particular the right to privacy. We comply with applicable personal data protection legislation and take the necessary measures to protect the personal data we collect.

What do we expect from you?

- Follow the guidelines applicable at ANTAL Sp. z o.o.
- Observe technical personal data protection requirements designed to prevent unauthorised access.
- You may use personal data stored in ANTAL Sp. z o.o. systems only for the purposes for which they were collected.
- If you gain access to personal data stored in the systems to a broader extent than is necessary to perform your duties, report this to your immediate manager or the Data Protection Officer of ANTAL Sp. z o.o.

4. Intellectual property

At ANTAL Sp. z o.o., all patents, copyrights, know-how, trade marks and similar rights constituting the intellectual property of ANTAL Sp. z o.o. are used appropriately and are not disclosed without proper justification. ANTAL Sp. z o.o. also respects the intellectual property of third parties.

What do we expect from you?

- Without authorisation, you must not use, publish or disclose materials protected by applicable law that belong to ANTAL Sp. z o.o.
- If you are authorised to use the above materials, use them only in a permitted manner.
- Where materials originate from suppliers or business partners of ANTAL Sp. z o.o., comply with the relevant agreement in relation to the use and disclosure of those materials.
- Do not use, publish or disclose materials protected by applicable law that belong to others.
- Do not share access credentials.

5. Open and responsible communication

At ANTAL Sp. z o.o., we make every effort to ensure that our reporting is timely, reliable and transparent. All information which we are required to disclose is true.

What do we expect from you?

- Record information accurately and honestly, as management makes business decisions on the basis of information obtained from you.
- Do not enter untrue information into records or reports.
- Report errors in financial records to your immediate manager without delay.
- Provide transparent information concerning, in particular, products, services, procedures, capabilities and achievements.
- Provide relevant information to the persons who need it in a timely manner, without misleading them, and in an accurate and understandable form.

V. Your voice

Prompt reporting of a breach of the Code, or a suspected breach, contributes to the effective resolution of the issue and minimises harm. If you know of or suspect conduct that breaches the Code, you should report it.

How should you do this?

Please refer to the Internal Regulations for Reporting Breaches of Law and the Protection of Persons Reporting Breaches of Law.

ANTI-BULLYING AND ANTI-DISCRIMINATION POLICY OF ANTAL Sp. z o.o.

(hereinafter referred to as the “Anti-Bullying Policy”)

1. Introduction
2. Purpose of the Anti-Bullying Policy
3. Definitions
4. Rights and obligations of employees and the employer
5. Principles of the Anti-Bullying Policy
6. Procedure in the event of bullying, discrimination or undesirable conduct
7. Reporting undesirable conduct
8. Implementation of the Anti-Bullying Policy at ANTAL Sp. z o.o.
9. Intervention and support measures
10. Assessment of the risk of bullying and discrimination, and monitoring compliance with the Anti-Bullying Policy at ANTAL Sp. z o.o.

1. Introduction

ANTAL Sp. z o.o. does not tolerate bullying or discrimination. At ANTAL Sp. z o.o., we avoid discrimination against employees and third parties on the grounds of race, sex, age, nationality, ethnic origin, skin colour, political views, sexual orientation, religious beliefs, social origin or disability. At ANTAL Sp. z o.o., we comply with, and expect compliance with, applicable anti-discrimination legislation. Where such conduct is identified, we take appropriate action.

The Anti-Bullying Policy has been approved by the Management Board of the Company and adopted for application by its employees and associates.

The Anti-Bullying Policy applies to all employees and associates, irrespective of their position at ANTAL Sp. z o.o., form of engagement or branch in which they work.

ANTAL Sp. z o.o. makes every effort to inform all persons who perform any services in the name of, or for the benefit of, ANTAL Sp. z o.o. of the principles of the Anti-Bullying Policy. Such persons are obliged to ensure that their actions comply with applicable law, taking into

account the principles covered by the Anti-Bullying Policy and the provisions on this subject contained in the Code of Ethics of ANTAL Sp. z o.o.

All employees of ANTAL Sp. z o.o. are required to complete a declaration confirming that they have read the Anti-Bullying and Anti-Discrimination Policy of ANTAL Sp. z o.o. These declarations shall be included in the employee's personnel file.

2. Purpose of the Anti-Bullying Policy

The purpose of the Anti-Bullying Policy is to establish principles and standards of conduct at ANTAL Sp. z o.o. aimed at counteracting, preventing and responding to bullying or discrimination. In addition, the implementation of the Anti-Bullying Policy is intended to build and maintain a positive atmosphere and good relationships in the working environment, and to prevent not only bullying and discrimination but also conflicts and other inappropriate conduct.

The Anti-Bullying Policy sets out the principles and the manner in which action should be taken where bullying or discriminatory conduct occurs.

3. Definitions

Employer/Company means ANTAL Sp. z o.o., with which an agreement, including an employment contract, has been concluded.

Employee means a person employed by the Employer under an employment contract.

Trusted Person means an Employee or Associate of impeccable reputation appointed by the Management Board of the Company to perform the role of Trusted Person.

Committee means a team which may be appointed by the Trusted Person to assist in conducting an investigation into a report of bullying or discriminatory conduct.

Associate means a person performing work for the Company under an agreement other than an employment contract, for example a mandate contract or a services agreement.

Discrimination means unequal treatment in respect of the establishment and termination of an employment relationship, terms and conditions of employment, promotion, and access to training for the purpose of improving professional qualifications, in particular on the grounds

of sex, age, disability, race, religion, nationality, political beliefs, trade union membership, ethnic origin, faith, sexual orientation, fixed-term or indefinite-term employment, or full-time or part-time employment.

Harassment means undesirable conduct whose purpose or effect is to violate the dignity of an Employee/Associate and create an intimidating, hostile, degrading, humiliating or offensive environment for that person.

Sexual Harassment means any undesirable conduct of a sexual nature or relating to the sex of an Employee/Associate whose purpose or effect is to violate the dignity of that Employee/Associate, in particular by creating an intimidating, hostile, degrading, humiliating or offensive environment; such conduct may include physical, verbal or non-verbal elements.

Bullying means conduct concerning an Employee/Associate or directed against an Employee (including an Associate), consisting of persistent and prolonged harassment or intimidation of the Employee/Associate, resulting in a diminished assessment of their professional suitability, or causing or intended to cause their humiliation or ridicule, isolation or exclusion from a team of colleagues.

Undesirable Conduct means discrimination, harassment, sexual harassment and bullying.

4. Rights and obligations of employees and the employer

The Employer shall take all measures provided for by applicable law to ensure that the working environment is free from bullying, discrimination and other forms of psychological violence against employees, whether perpetrated by managers or other employees.

In particular, the Employer is obliged to take all measures provided for by law to prevent bullying and discrimination and to eliminate the social effects of bullying and discrimination in the working environment at ANTAL Sp. z o.o., including by taking appropriate intervention measures. The Employer is also obliged to provide necessary assistance to victims of discrimination, bullying and sexual harassment.

Employees who perform managerial functions at ANTAL Sp. z o.o. are required to make particular efforts to ensure a working environment free from bullying and discrimination.

Employees of all organisational units of the Company are obliged not to engage in conduct displaying characteristics of bullying or discrimination and to counteract such conduct by other persons in the working environment.

Employees' obligations connected with compliance with the standards of workplace culture and ethics, and with the prevention of bullying and discrimination, include in particular:

respecting the dignity and personal rights of all participants in the work process;

applying principles of social coexistence, kindness and courtesy in mutual relations, ensuring order and the preservation of well-being and mental health;

informing the Employer of any manifestations of bullying observed in the workplace and of situations that may indicate discrimination or conflict between participants in the work process;

actively participating in anti-bullying training organised by the Employer and complying with the rules of conduct set out in this Policy.

Any employee who feels that they are a victim of bullying or discrimination has the right to request that the Employer take action aimed at eliminating those phenomena, mitigating their effects and applying the sanctions provided for by law to persons who commit the relevant breach.

Unfounded accusations of bullying or discrimination are prohibited.

5. Principles of the Anti-Bullying Policy

Zero tolerance for bullying or discrimination

Zero tolerance for bullying or discrimination is the overriding principle observed by all employees and associates, irrespective of their position at ANTAL Sp. z o.o. and their form of engagement, in every area of ANTAL Sp. z o.o.'s business activities.

Compliance with applicable law

All employees and associates, irrespective of their position at ANTAL Sp. z o.o. and their form of engagement, shall act in accordance with applicable law and the adopted Code of Ethics of ANTAL Sp. z o.o.

Prohibition of retaliation

No retaliatory measures may be taken against persons who submit complaints concerning Undesirable Conduct. Such measures may consist of direct or indirect acts or omissions connected with a report or public disclosure which may infringe the rights of the reporting person or cause them harm, as well as any attempt or threat to apply such measures. Retaliatory measures must not even potentially infringe the rights of the reporting person.

6. Procedure in the event of bullying, discrimination or undesirable conduct

All Employees and Associates are required to respect the personal rights of other Employees or Associates, as well as the Employer's clients and other contracting parties.

Employees (including Associates) against whom Undesirable Conduct has been directed, or who become aware of any Undesirable Conduct towards Employees or Associates, as well as the Employer's clients and other contracting parties, are obliged to report the matter to the Employer via the Trusted Person, the Contact E-Mailbox or by post.

Failure to comply with the above obligations shall constitute a breach of employee duties.

7. Reporting undesirable conduct

Prompt reporting of Undesirable Conduct contributes to the effective resolution of the issue and minimises harm or injury.

7.1 Contact E-Mailbox

For this purpose, the Employer has established a Contact E-Mailbox at zgloszenie@antal.pl for reporting Undesirable Conduct. Only persons currently acting as Trusted Persons have access to the Contact E-Mailbox. The Trusted Person shall receive the relevant data necessary to operate the Contact E-Mailbox.

ANTAL Sp. z o.o. shall appoint from among its Employees or Associates at least one Trusted Person who, in the Company's assessment, has the appropriate qualities and the trust of Employees and Associates to perform this role.

A Trusted Person may be removed from the role by ANTAL Sp. z o.o. at any time. A Trusted Person may resign from the role at any time. For this purpose, they should submit a statement to the Management Board of the Company in documentary form.

The duties of the Trusted Person include:

- operating the Contact E-Mailbox and handling postal correspondence;
- receiving complaints concerning Undesirable Conduct submitted in person by Employees and Associates;
- conducting a preliminary assessment of complaints and deciding whether it is necessary to appoint a Committee;
- where necessary, asking the person submitting the complaint to supplement or clarify it;
- supporting Employees in preventing or resolving conflicts within the organisation.

7.2 Submitting a complaint

Complaints concerning Undesirable Conduct may be submitted:

- via the Contact E-Mailbox at zgloszenie@antal.pl;
- by post to: Antal Sp. z o.o., ul. Puławska 2, 02-566 Warsaw, marked: "Report. Do not open – addressee only";
- in person to the Trusted Person.

A complaint should:

- specify the nature of the Undesirable Conduct;
- identify any witnesses to the incident;
- identify any evidence of the Undesirable Conduct.

A complaint may be made by name or anonymously. All reports are registered. The Employer shall take appropriate steps taking into account the content of the complaint, the possibility of supplementing it and clarifying the situation, while taking account of the anonymity of the complaint.

An Employee or Associate who makes a report in good faith shall not suffer any negative consequences as a result. No form of harassment or victimisation may be applied to an Employee or Associate. Breach of this prohibition shall constitute a serious breach of basic employee duties.

Depending on the manner in which they are submitted, complaints concerning Undesirable Conduct shall be documented in electronic and paper form.

Personal data processed in connection with the receipt of a report by the Trusted Person or the taking of follow-up action, as well as documents relating to that report, shall be retained for two years after the end of the calendar year in which the report was submitted.

7.3 Committee for Reports of Undesirable Conduct (the “Committee”)

The Trusted Person may decide that it is necessary to appoint a Committee in order to obtain assistance in clarifying the circumstances of a complaint and assessing its merits. The template Minutes on the Appointment of Committee Members constitutes Appendix No. 1 to the Anti-Bullying Policy.

The Committee shall consist of three to five persons, including the Trusted Person as Chair of the Committee.

The members of the Committee shall be selected by the Trusted Person from among Employees and Associates.

The following persons may not be members of the Committee:

- a person to whom the complaint relates;
- a person who submitted the complaint;
- a person in respect of whom allegations concerning Undesirable Conduct have been confirmed;
- the direct manager of the person to whom the complaint relates;
- a person directly subordinate to the person to whom the complaint relates.

If there is any circumstance concerning a Committee Member that may give rise to doubts as to their impartiality, independence or objectivity, that person may withdraw from the work of the Committee by submitting a written declaration to the Trusted Person. In such a case, the Trusted Person shall appoint another person to the Committee.

Participation in the work of the Committee is voluntary. A Committee Member may resign from the role at any time.

Membership of the Committee shall end upon termination of the employment relationship.

Committee Members are obliged to keep confidential all information obtained in connection with their participation in the work of the Committee. A Committee Member shall submit a declaration in the form set out in Appendix No. 2 to the Anti-Bullying Policy.

A Committee Member must not suffer negative consequences for activities undertaken in good faith as part of the Committee. In particular, no form of harassment or victimisation may be applied to a Committee Member. Breach of this prohibition shall constitute a serious breach of basic employee duties.

7.4 Investigation

If a complaint is well-founded, the Trusted Person (or, if appointed, the Committee) shall conduct an investigation in order to clarify the circumstances of the complaint and assess its merits.

The Trusted Person is obliged to handle the complaint efficiently and, where necessary, to convene and chair the Committee.

The investigation, including Committee meetings, shall be confidential and shall take place at the Employer's premises and during working hours. Persons involved in the work of the Committee in accordance with the provisions of the Anti-Bullying Policy shall be released from the obligation to perform work for the time necessary to carry out activities involving them, while retaining the right to remuneration.

If justified by the interests of the person against whom Undesirable Conduct has been directed, the Trusted Person may, with the prior consent of the Management Board of the Company, order that the investigation, including Committee meetings, be conducted outside the Employer's premises, but during working hours.

The investigation, including Committee meetings, may also be conducted using means of remote communication.

In order to clarify all relevant circumstances, the Trusted Person (or, if appointed, the Committee) should in particular:

- request that the person who submitted the complaint supplements or clarifies it;
- request that the person against whom the Undesirable Conduct has been directed provide oral or written explanations of the circumstances of the complaint;

- where necessary, obtain access to video surveillance recordings;
- hear witnesses;
- conduct a confrontation;
- where necessary, obtain access to employee documentation, including Employees' personnel files;
- where necessary, obtain access to selected business e-mail correspondence of an Employee.

If the complaint is well-founded and necessary for the benefit of the person against whom Undesirable Conduct was directed, the Trusted Person may, before the complaint is finally resolved, request that the Employer:

- temporarily change the workplace of that person or the alleged perpetrator;
- assign other work to that person or the alleged perpetrator;
- conduct mediation;
- provide other assistance to that person, including psychological support.

After thoroughly clarifying all relevant circumstances, the Trusted Person (or, if appointed, the Committee) shall:

- assess the merits of the complaint under consideration;
- classify the established Undesirable Conduct;
- prepare recommendations for further action by the Employer.

If appointed, the Committee shall decide by a simple majority of votes, understood as a greater number of votes "for" than votes "against". In the event of an equal number of votes, the vote of the Chair of the Committee (the Trusted Person) shall be decisive. Once the investigation has been completed, minutes shall be drawn up of the actions taken during the investigation. A template of the minutes constitutes Appendix No. 3 to the Anti-Bullying Policy.

The minutes are confidential and may be inspected by the Trusted Person, Committee Members and the Management Board of the Company.

If a Committee has been appointed, the minutes shall be signed by all Committee Members. A refusal by any Committee Member to sign the minutes shall be noted in the minutes, together with a note of the refusal to sign.

Each Committee Member may submit a dissenting opinion regarding the Committee's findings. A Member who submits a dissenting opinion shall provide written reasons, which shall constitute an appendix to the minutes. The minutes shall be submitted to the Management Board of the Company immediately after they are drawn up.

The Management Board of the Company shall provide the person who submitted the complaint and the person whose conduct was the subject of the complaint with information containing the key findings and the outcome of the investigation. The information provided to those persons should be anonymised, i.e. it should not disclose the identity of the complainant or witnesses.

8. Implementation of the Anti-Bullying Policy at ANTAL Sp. z o.o.

ANTAL Sp. z o.o. conducts an analysis of the working environment in order to assess the occurrence of Undesirable Conduct.

ANTAL Sp. z o.o. has implemented the Anti-Bullying Policy containing guidelines for preventing bullying and discrimination (section 5 of the Anti-Bullying Policy), in order to identify, eliminate and respond to any conduct of a bullying or discriminatory nature.

For the purpose of implementing the Anti-Bullying Policy, ANTAL Sp. z o.o. has implemented training for candidates, Employees and Associates, including Employees and Associates managing teams, concerning, among other things, the recognition and prevention of Undesirable Conduct in the working environment, and makes available to them the provisions on equal treatment constituting an extract from the Labour Code.

9. Intervention and support measures

During the proceedings, the Committee shall determine whether, and which, intervention measures against the perpetrator or support measures for the victim of bullying, discrimination or sexual harassment should be taken in a particular case in order to immediately stop these phenomena in the workplace or in connection with work. Their purpose is to stop phenomena identified as conflict-related.

An intervention measure may consist primarily of a mediation procedure, i.e. a confidential and informal dispute resolution process based on a voluntary agreement between the parties with the participation of a mediator.

The mediator oversees the mediation procedure and is responsible for monitoring, reporting and compliance with the terms of the settlement. The terms of the settlement concluded by the parties to the proceedings and the mediator bring the mediation procedure to an end.

The duration of the mediation procedure should be determined before it begins.

The mediation procedure is confidential.

As part of intervention and support measures, it is advisable to submit an application for transfer to another workplace, i.e. another department or room.

10. Assessment of the risk of bullying and discrimination, and monitoring compliance with the Anti-Bullying Policy at ANTAL Sp. z o.o.

ANTAL Sp. z o.o. shall assess compliance with the Anti-Bullying Policy and evaluate each reported case.

Where necessary, the Anti-Bullying Policy shall be updated on the basis of regular assessments and conclusions drawn from them.

ANTAL Sp. z o.o. may conduct periodic surveys in order to assess the atmosphere within the team of Employees and Associates and, where necessary, shall take appropriate steps.

Appendixes

Appendix No. 1 – Template Minutes on the Appointment of Members of the Committee for Reports of Undesirable Conduct.

Appendix No. 2 – Template Declaration of a Committee Member.

Appendix No. 3 – Template Minutes of the Investigation.

Appendix No. 4 – Template Declaration Confirming Familiarisation with the Internal Anti-Bullying Procedure.

Appendix No. 1 to the Anti-Bullying Policy

Update of 20 August 2026

MINUTES

on the Appointment of Members of the Committee for Reports of Undesirable Conduct (the “Committee”)

Acting pursuant to the provisions of the Anti-Bullying Policy, I hereby appoint the Committee in the following composition:

1. Ms Marta Lebuda – Chair of the Committee (Trusted Person);
2. Ms Katarzyna Owczarczyk – Committee Member;
3. Ms Urszula Załuga – Committee Member.

The Committee shall act in accordance with the provisions of the Anti-Bullying Policy.

Date and signature of the Trusted Person

Appendix No. 2 to the Anti-Bullying Policy

..... (place, date)

..... (full name of the Committee Member)

..... (position)

DECLARATION

In connection with my appointment to the Committee for Reports of Undesirable Conduct considering a complaint concerning submitted by: (full name of complainant), (position), on (date of submission of complaint), I hereby declare that:

1. No circumstance exists that could give rise to doubts as to my impartiality, independence or objectivity.
2. I shall keep confidential all information obtained in connection with the proceedings conducted.

Signature of the Committee Member

MINUTES

of the investigation concerning a complaint dated

The Committee for Reports of Undesirable Conduct (the “Committee”), considering the complaint, is composed of:

1. Ms Marta Lebuda – Chair of the Committee (Trusted Person);
2. Ms Katarzyna Owczarczyk – Committee Member;
3. Ms Marta Koziół – Committee Member.

In the course of the investigation, the Committee took the following actions:

1.
2.
3.

As a result, the Committee established the following facts:

Recommendations of the Committee for further action by the Employer:

Template Declaration Confirming Familiarisation with the Internal Anti-Bullying Procedure

..... (place, date)

DECLARATION

confirming familiarisation with the Internal Anti-Bullying Procedure

.....

(full name)

.....

(position)

In connection with the Resolution of ANTAL Sp. z o.o. dated 2024 implementing the Code of Ethics and the Anti-Bullying and Anti-Discrimination Policy, I hereby declare that I have read the Anti-Bullying and Anti-Discrimination Policy of ANTAL Sp. z o.o. and undertake to comply with it.

.....

(signature of the declarant)