



InPost Group
Code of Conduct

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1. INTRODUCTION

This Code of Conduct (the **“Code of Conduct”** or **“CoC”**) applies to all employees, contractors and temporary staff, including the management and members of governing bodies (the **“Staff”**) working for InPost S.A. with its corporate seat in Luxembourg, Grand Duchy of Luxembourg, as well as Staff working for any of InPost S.A. subsidiaries, meaning the companies in which InPost S.A. directly or indirectly holds 50% or more shares or voting rights, or which are controlled by InPost S.A. through their governing bodies. InPost S.A. and its subsidiaries are jointly referred to as the **“InPost Group”**.

2. PURPOSE

The purpose of this Code of Conduct is to define generally acceptable behavior within the InPost Group. The Code of Conduct is intended to ensure that InPost Group members and their Staff conduct their operations in an honest and transparent manner and with the highest integrity, in line with the best interests of the InPost Group.

The Code of Conduct provides guidance to InPost Group members and their Staff in their decision-making process and actions and is supported by additional policies and procedures governing the activities of InPost Group.

3. STANDARD OF CONDUCT

At InPost Group, an essential part of responsibly conducting our operations is behaving in accordance with the applicable legal provisions, as well as with our values. InPost Group members will conduct all their business operations according to the applicable law and with honesty, integrity and openness, and operates as an open, transparent corporate group.

Non-compliance with the provisions of this Code of Conduct may lead to internal disciplinary measures including, but not limited to, dismissal and administrative sanctions.

4. INTEGRITY

4.1. Business integrity

InPost Group companies and their Staff conduct their business with integrity in accordance with good business practice, especially with respect to dealing with third parties. Each Staff member must exercise good judgment and avoid any circumstance that would violate applicable law or spirit of this Code of Conduct.

4.2. Behavior of the Staff

InPost Group companies expect their Staff to work with honesty, integrity, with respect to others and opposes any harassment, discrimination or unequal treatment for any reason. High standards of personal behavior must also be observed in the relationships with colleagues, as well as in dealings with business partners, merchants, consumers, professional advisers, shareholders, banks and other third parties. Staff members are expected to be responsible for the performance and reputation of InPost Group and to avoid any behavior that might harm InPost Group's performance or reputation.

Detailed rules pertaining to preventing harassment, discrimination and unequal treatment are outlined in the Anti-harassment and anti-discrimination policy, which can be found in an Appendix to this document.

All instances of harassment or discrimination should immediately be reported to the Compliance Officer.

4.3. Integrity in dealing with third parties

InPost Group companies recognize that in dealing with third parties (e.g. business partners, merchants, consumers and other stakeholders) acting with responsibility, reliability and integrity are essential preconditions. In this respect, InPost Group will always act in good faith and expects their Staff to act accordingly and refrain from actions that may damage these preconditions.

4.4. Integrity in financial reporting

InPost Group's accounting records and supporting documents must accurately describe and reflect the nature of the underlying transactions. InPost Group is required to comply with generally accepted accounting rules and procedures at all times. No false, artificial or misleading entries may be made in its books or records. Full information must be provided to In Post Group's auditors.

5. COMPLIANCE WITH LAWS AND REGULATIONS

5.1. General

InPost Group companies and their Staff are required to comply with the laws and regulations of the countries in which the InPost Group companies operate, as well as with any applicable provisions of international law. Staff should seek advice of their respective Legal Counsels within the InPost Group if there is any doubt over the correct interpretation or consequences of laws and regulations.

5.2. Competition and antitrust

Staff members must not exchange any information pertaining to the operations of the InPost Group companies with competitors, especially information regarding costs, pricing policies, terms or conditions of service offerings, future locations of APMs, market share, or any other information in violation of applicable competition or antitrust laws.

5.3. Money laundering and financing of terrorism

Staff members must not engage in money laundering, where money or other items of value obtained by illegal means are passed through a legitimate business to hide its true source. Moreover, Staff members shall remain vigilant for any activities performed by the InPost Group's clients, suppliers and other business partners which may raise suspicions of money laundering.

Staff members must not engage in the financing of terrorism, where money or other items of value, whether originating from a legal or an illegal source, are used to fund persons or groups planning to engage or are currently engaging in domestic or international terrorism. Moreover, Staff members shall remain vigilant for any activities performed by the InPost Group's clients, suppliers and any other business partners which may raise suspicions of financing of terrorism.

Where applicable law requires a company within the InPost Group to adopt an anti-money laundering and counter-terrorism financing measures and policies, such policies shall be adopted in line with the legal requirements.

The **Anti-money laundering/counter-terrorism financing policy** regarding the InPost Group companies based in Poland, which can be found in an Appendix to this document.

Any and all suspicious activities shall immediately be reported to the Compliance Officer.

5.4. Government inquiries and investigations

All Staff members must fully cooperate with all government investigations involving InPost Group, and must not obstruct, impede or improperly influence any official proceeding. If a Staff member learns about a possible government investigation or proceeding outside the ordinary course of business, such Staff member must immediately inform their line manager of such an occurrence.

5.5. Bribery and corruption

Staff members must not offer, pay, demand or accept bribes, kickbacks, facilitation or similar payments. In addition, Staff members must not make use of a third party to pay or accept bribes, kickbacks, facilitation or similar payments.

Detailed rules pertaining to preventing bribery and corruption are outlined in the **Anti-corruption policy**, which can be found in an Appendix to this document.

All instances of corruption or suspicion thereof should immediately be reported to the Compliance Officer.

5.6. Insider trading

Staff members may not engage in insider trading, meaning trading in shares or derivatives of InPost S.A. outside of periods when such trading is allowed by the relevant provisions of the law.

Detailed rules pertaining to preventing insider trading are outlined in the Insider trading policy constituting an appendix hereto.

All instances of insider trading should immediately be reported to the Compliance Officer.

5.7. Human rights

InPost Group is committed to observing both international and domestic laws and regulations regarding human rights, both internally and in choosing clients, suppliers and other business partners. InPost Group makes sure, in particular, that no instances of child labor occur in InPost Group companies or in companies of their clients, suppliers or business partners, and that no instances of discrimination on any ground occurs in InPost Group companies. The human rights protection plan is set out in the Anti-discrimination and anti-harassment policy, Diversity policy and Supplier Code of Conduct.

6. COMPANY PROPERTY

6.1. Responsible use

Staff members are expected to respect high standards of personal behavior in their use of InPost Group's resources. The personal use of equipment (e.g. mobile phones, company cars and computers) that belongs to InPost Group is accepted, provided that the equipment is not abused, that the Staff member takes all reasonable actions to prevent any theft of such equipment, and the Staff member secures confidentiality of business information. Staff members are expected to exercise their good judgement in determining what an acceptable level of personal use is.

Staff members must not use mobile phones, company cars and computers, and other company property for (i) illegal activities; (ii) inappropriate activities that can offend others or be harmful to the company; and (iii) outside businesses or other personal gain.

The companies within the InPost Group may introduce more detailed policies or procedures regarding the use of company property.

6.2. Business documents and financial records

Staff members must ensure that all company records and reports are retained, presented and disposed of in accordance with applicable laws and local record retention policies, and must not alter, destroy or conceal any record, document or other object in order to impair its integrity or availability. In addition, Staff members must record financial transactions properly, accurately and fairly, and in the correct accounts and accounting period.

7. HEALTH AND SAFETY

InPost Group is committed to providing healthy and safe work environments for all Staff members. Staff members are required to follow all health and safety laws and regulations and immediately

report any accidents, injuries and unsafe practices or conditions to their line manager, local health and safety manager or Compliance Officer.

Each of the InPost Group companies shall introduce their respective health and safety policies and procedures in accordance with the local legal requirements.

8. CONFLICT OF INTEREST

8.1. General

All Staff members are expected to have no personal activities and financial interests which could conflict with their responsibility to InPost Group, unless authorized by InPost Group. Staff members should not seek to gain for themselves or others through misuse of their positions. Even the appearance of a conflict of interest is to be avoided as this can also negatively affect InPost Group's integrity and reputation.

InPost Group is dedicated to prevent both internal and external conflict of interest in all of its forms. Internal conflict of interest occurs when a Staff member is a superior of a relative, partner or other person they have a close personal relationship with, when such relationship might potentially affect fair treatment of other Staff members on the team. External conflict of interest occurs when a Staff member uses their position within InPost Group in order to offer favorable treatment to a relative, partner or other person with whom they have a personal relationship who is outside of the InPost Group (e.g. a client, supplier or other business partner).

Detailed rules pertaining to preventing conflict of interest are outlined in the Anti-corruption policy, which can be found in an Appendix to this document.

All instances of potential or existing conflict of interest should immediately be reported to the Compliance Officer.

8.2. Financial interests in other companies

If Staff member or their relative, partner or a person they have a personal relationship with have a financial interest in, or obligation to, a competitor, it must disclose such interests or obligations in accordance with local disclosure procedures.

8.3. Outside employment and other activities

Staff members may participate in legitimate and lawful activities outside of InPost Group, including outside employment, provided that (i) such activity may not adversely affect the Staff member's performance at work, may only be conducted outside working hours, and may not otherwise conflict with their work; and (ii) such activity does not involve being employed by, or serving on, the board of directors of a competitor. If a Staff member serves as a director or on the supervisory board of any for-profit organization, they must disclose such activity and obtain prior written approval from the relevant InPost Group company.

8.4. Funding of political parties

In order to avoid any possible conflict of interest, InPost Group companies shall not fund any political parties or political candidates.

8.5. Funding of tobacco and alcohol companies

InPost Group companies shall not fund or promote companies engaging in the sale of alcohol, tobacco or any goods or services deemed to pose public health risks.

9. CONFIDENTIAL INFORMATION

All business information relating to InPost Group's businesses, properties, shareholders, business plans, organization, financial affairs and all other affairs of InPost Group is InPost Group's proprietary information. Staff members should ensure that this information is kept confidential and may not disclose such information to third parties, unless they are legally permitted and authorized to do so.

10. COMPLIANCE AND MONITORING

10.1. Compliance

The Management Boards of the respective InPost Group companies are responsible for ensuring that the Code of Conduct and other Compliance System policies are communicated to all Staff members, as well as for periodically reviewing the Compliance System and the functioning thereof with the help of the Compliance Officer.

Staff members who have questions about, or do not understand certain provisions of, the Code of Conduct are encouraged to contact InPost Group's Compliance Officer.

All Staff members are responsible for compliance with the Code of Conduct.

All Staff members are required to follow the principles set out in this Code of Conduct diligently when dealing with any business on behalf of InPost Group companies.

10.2. Compliance Officer

10.2.1. Role and requirements

The InPost Group Compliance Officer is appointed by the Management Board of InPost S.A. and is responsible for Compliance System across the InPost Group. The Compliance Officer is independent to the broadest possible extent and reports directly to the InPost S.A. Management Board or – in matters pertaining to the Management Board – to InPost S.A. Supervisory Board.

The Compliance Officer must possess the relevant experience, knowledge and competences to manage and maintain the Compliance System.

The Compliance Officer may not hold any other positions in InPost Group, especially executive positions, except for the position of General Counsel or Chief Legal Officer.

In case of an absence of the Compliance Officer their tasks may be assumed by a designated Board Member on an interim basis. In case of a prolonged absence or vacancy in the Compliance Officer, a new Compliance Officer must be immediately appointed.

InPost S.A. may appoint a Deputy Compliance Officer reporting to the Compliance Officer.

InPost Group companies may appoint local Compliance Officers responsible for Compliance System in an individual company. In such case, all notifications and reports may be made to such local Compliance Officers. Local Compliance Officers report to the Compliance Officer.

10.2.2. Responsibilities

The Compliance Officer is responsible for:

- maintaining and reviewing the Compliance System;
- monitoring the Compliance System;
- processing notifications relating to the Compliance System;
- maintaining full confidentiality in matters relating to the Compliance System;
- providing necessary Compliance training to the Staff.

10.2.3. Monitoring and reporting

A record of all breaches of the Code of Conduct and frauds is monitored by InPost Group's Compliance Officer (or the chairman of the Supervisory Board if applicable), who will provide annual reports to both the Management Board and the Supervisory Board.

Staff members should report any violation of this Code of Conduct, including but not limited to violation of laws and regulations, misbehavior with regard to accounting, criminal offences and incidents of fraud, bribery, discrimination or harassment, to InPost Group's Compliance Officer or in case it relates to one of the members of the Management Board, to the chairman of the Supervisory Board of InPost S.A. (the "Supervisory Board") in accordance with InPost Group's Whistleblower Policy.

10.2.4. Notification of breaches and processing of notifications

The Compliance Officer may be contacted via e-mail at compliance@inpost.pl or compliance@inpost.eu or by traditional mail at

Compliance Officer
InPost sp. z o.o.
ul. Wielicka 28
30-552 Kraków, Poland.

All mail addressed to the Compliance Officer will be kept confidential and will be relayed to the Compliance Officer personally without being opened by any third persons.

If the person notifying the Compliance Officer of any irregularities chooses to remain anonymous, the Compliance Officer will not make attempts to establish the notifying person's identity.

If the person notifying the Compliance Officer of an irregularities chooses to divulge their identity to the Compliance Officer, the Compliance Officer will protect the identity of such person and will not divulge their identity to any third persons. If divulging the person's identity to any third persons is necessary (i.e. to HR in harassment cases), the Compliance Officer will only divulge the notifying person's identity to such third persons upon their prior explicit consent.

The Compliance Officer shall at all times be supported by the HR department, legal department, Risk Manager and any other department within the InPost Group as need may be.

10.2.5. Internal investigation

The Compliance Officer is authorized to initiate and conduct internal investigations in case of suspected breach of the Code of Conduct. All Staff members are obliged to aid the Compliance Officer in internal investigations to the fullest extent possible, upon Compliance Officer's request. Staff members participating in internal investigations must maintain full confidence as to all information learned during such investigation.

The Compliance Officer may decide that a breach of the Code of Conduct constituting a breach of applicable law should be notified to the relevant authorities and cooperate with such authorities.

10.2.6. Personal Data

The Compliance officer is authorized to process personal data gathered in the processes of maintenance of the Compliance System, Compliance training and internal investigations to the extent necessary. The legal basis for personal data processing is InPost Group's and individual companies' legitimate interest.

10.3. Governing Bodies

The Management Board of InPost S.A. and governing bodies of all other InPost Group Companies (the "Governing Bodies") shall support the Compliance Officer to the extent required and ensure the independence of the Compliance Officer.

The Governing Bodies shall provide the Compliance Officer with all necessary resources, including sufficient funding and qualified supporting staff.

10.4. No retaliation

InPost respects Staff members who raise concerns about improper behavior. We will not retaliate or allow retaliation against anyone who in good faith reports a potential violation of the Code of Conduct or other company policy.

Any retaliation will be seen as a serious violation of this Code of Conduct this may result in disciplinary action, including termination of employment.

10.5. Company policies and the law

This Code of Conduct does not cover every policy, law or regulation that may apply to Staff members. If a rule in this Code of Conduct conflicts with applicable laws or regulations, such laws or regulations take precedence to the extent that it is more restrictive than this Code of Conduct.

10.6. Training and reviews

InPost Group companies shall provide all new Staff members with the relevant Compliance training upon their onboarding. All Staff members shall undergo Compliance training periodically, no less often than once every 18 months or, in case of substantial changes in the Compliance

System – after the introduction of such changes. The Compliance training may be conducted in person or on-line, via various on-line learning platforms. Staff members may be required to take a Compliance knowledge test upon completion of their Compliance training.

11. FINAL PROVISIONS

- 11.1. This Code of Conduct was adopted by the Management Board of InPost S.A. on 2021 and shall come into force on 2021 across InPost Group.
- 11.2. This Code of Conduct and all appendices referenced in this document will be published on the inpost.eu website and made available for download. Governing bodies of the InPost Group companies may decide to publish the Code of Conduct on their respective internal computer networks (Intranet) as well.
- 11.3. If the laws of the country where a specific subsidiary has its corporate seat require the adoption of the Code of Conduct by the subsidiary's governing body, such governing body should adopt the relevant resolution introducing the Code of Conduct.
- 11.4. If the laws of the country where a specific InPost Group company has its corporate seat require the adoption of more stringent or more comprehensive rules pertaining to the subject matter in question, an individual policy pertaining to such specific InPost Group Company shall be adopted by the relevant InPost Group company's governing body and will be added to the Code of Conduct as an Appendix.
- 11.5. The following appendices along with this Code of Conduct constitute the InPost Group Compliance System:
 - Anti-harassment and anti-discrimination policy;
 - Diversity policy;
 - Anti-money laundering and counter-terrorism financing policy (pertains to InPost Group companies based in Poland);
 - Anti-corruption policy;
 - Insider trading policy;
 - Supplier Code of Conduct;
 - Business Partner due diligence procedure.
- 11.6. The present InPost Group Compliance System shall replace all policies and procedures previously in place in the InPost Group companies covered by the scope of this document.