

**InPost S.A. – Stakeholder Engagement Policy**  
**December 2023**

**Introduction**

At InPost Group (also referred to as the “Group”, “InPost” or “InPost Group”), we strongly believe in open and transparent communication with our Stakeholders (which are described in the section “The Company’s Stakeholders” below). We highly value the interests of all our Stakeholders and work to achieve a balance between our financial interests and environmental, social and governance (ESG) responsibilities, with respect for the protection of internationally proclaimed human rights.

Particularly important to us is the impact of the Group's activities, both direct and indirect, on all our Stakeholders in the economic, social, human rights (including labor) and environmental areas, and its contribution to achieving the Sustainable Development Goals (“SDG”) approved by the United Nations United States. **This policy corresponds with the Universal Declaration of Human Rights, the Ten Principles of the UN Global Compact, the UN Guiding Principles on Business and the Human Rights and Fundamental Conventions prepared by International Labour Organization.**

The Group’s Stakeholders play a leading role in the process of building the Group’s corporate reputation, which we define as their set of perceptions regarding the Group. These perceptions are very important, as they determine the decisions of the Stakeholders to invest, purchase the services and goods offered by the Group, enter into business relationships with the Group or make recommendations, which directly affect the long-term sustainability of a company or a corporate group.

Furthermore, appropriate management of the Group’s Stakeholders decisively contributes to the achievement of the purpose of protection of human rights recognised under domestic and international law as well as United Nations guidelines, as expressed in the Group’s principles and policies referring to the due diligence in the human rights area.

In fulfilling these responsibilities, and within the framework of the law and the articles of association and the guidelines for conduct that take shape in the Purpose and Values of the InPost Group, the board of directors of InPost S.A. (the “Board of Directors”) has adopted this Stakeholder Engagement Policy (the “Policy”).

The Policy includes:

1. Scope of the Policy
2. Purpose
3. Objective
4. Our Values
5. The Company’s Stakeholders
6. Regulatory framework
7. Engagement Consideration and Methodology
8. Stakeholder Engagement Responsibility
9. Stakeholder Engagement Risks
10. Guidance on evaluating and communicating the outcomes of the Stakeholder engagement.

## § 1

### Scope of the Policy

1. The Stakeholder policy is based on the AA100 Stakeholder engagement standard and the Dutch Corporate Governance Code and applies to the process of interaction with one or more Stakeholders, referring to every individual, organization or group that has an interest in, impact on or is impacted by the activities of InPost Group.
2. The Stakeholder engagement activities covered in this Policy refer to all brands and service categories of InPost Group along its value chain.
3. Stakeholders may be involved in defining the scope of the specific engagement activity (if applicable).
4. The timeframe of the Stakeholder engagement depends on the specific engagement activity and shall be defined individually by the related employees responsible for engagement with the particular Stakeholder. In general, the Stakeholder engagement should be considered an ongoing process where input and feedback are part of the continuous two-way communication between InPost and the relevant Stakeholder(s). Based on the timeframe of the engagement, it should be considered whether the engagement will look at long-term strategic issues, current concerns, or both.
5. This Policy shall also apply, to the extent relevant, to joint ventures, temporary joint ventures and other equivalent associations, if a company within the Group assumes the management thereof. The contents of this Policy must also govern the conduct of foundations linked to the Group.

## § 2

### Purpose

1. The purpose of this Policy is to establish the general framework for the Group's relations with its Stakeholders (which are described in "The Company's Stakeholders" section) in all of its activities and operations, in order to:
  - build a caring, trusting, honest, ethical and open relationship that advances mutual co-existence and shared value creation with our Stakeholders. By thinking 'out of the box', we ignite the passion and professionalism that fuel our growth;
  - continue supporting and respecting the protection of human rights and safeguarding the dignity of every human being;
  - continue responding to the legitimate interests of the Stakeholders the Group interacts with;
  - continue encouraging the engagement of the Stakeholders in the Group's business enterprise through a strategy of involvement in the communities in which it operates and the creation of shared sustainable value for all of them. We are committed to using the potential of the Group's products and services and implemented technologies to tackle climate change and reduce our impact on the environment;
  - ensure that opinions and needs of the Stakeholders are taken into account in our strategic processes if and as appropriate and applicable, and that any risks identified by us in the course of mutual communication are managed appropriately;

- continue building trust through multilevel transparency between InPost Group and its Stakeholders to build long-lasting and stable relationships. We believe that creating and sharing value with our Stakeholders is about more than just financial returns;
  - build and maintain an effective dialogue with Stakeholders to ensure their interests are considered in determining the sustainability aspects of InPost's strategy;
  - contribute to maintaining the corporate reputation in the various countries and businesses in which the Group operates through all of the above.
2. Notwithstanding the foregoing, the Board of Directors may approve other corporate policies addressing specific Stakeholders. For example, InPost S.A. also has a policy on bilateral contacts with shareholders in accordance with the Dutch Corporate Governance Code, which is posted on our website.

### § 3

#### Objective

The primary objectives of this policy are:

- to bring about consistency across the various business units in the various regions of InPost's business on issues relating to Stakeholder interests and engagement;
- to raise mutual awareness of InPost Group and Stakeholder interests and build trust-based relationships through effective engagements with all Stakeholders or groups of Stakeholders while ensuring transparent and honest communication to understand and address Stakeholder issues and concerns;
- to ensure regular, accessible and transparent consultation with Stakeholders in accordance with this Policy;
- to provide the framework for development of constructive, long-term relationships between InPost and its Stakeholders, based on dialogue and communication, that are aimed at attaining broad support in impacted communities;
- to provide the framework for ongoing Stakeholder identification, analysis, mapping and prioritisation, consultation and engagement, risk and negative impact identification, information sharing, and documentation of engagement and required follow-up actions;
- having a positive impact on Stakeholders in the value chain resulting from the goals and tasks set in InPost's ESG strategy.

### § 4

#### Our Values:

1. We have a set of five core values that guide our behaviour as we engage with our Stakeholders:
- *Dialogue* - we believe that in order to grow as a company, we must listen to the needs of our customers, employees and business partners. We break down barriers with technology. We want to share our vision of the future and create forward-looking

opportunities. We want to draw on the potential of technology to shape a new, more sustainable future together.

- *Creativity* - we want to shape the lifestyle of the future with creativity and innovation, improve cities, contribute to combating climate change, drive people and businesses forward.
- *Vision* - we have a vision and our ideas respond to important social needs and climate challenges. We care about the environment and try to conduct our business in a way that minimizes our impact on it.
- *Community* - we are a community of employees and business partners who combine the desire to create sustainable services and products for people and the planet and operate with respect for human rights
- *Innovation* - we create a universe of technological innovations and unique customer-oriented solutions.

## § 5

### The Company's Stakeholders

1. This policy applies to the whole InPost Group, with a focus on all Executives and Managers and their respective teams in all countries where InPost Group is present, working with all key internal and external Stakeholders.
2. InPost will ensure continuous improvement of skills of teams responsible for cooperation and building relationships with Stakeholders in order to more effectively take into account the needs in achieving business and ESG goals. The value chain made up of the activities carried out by the Group means that its Stakeholders are quite numerous. Therefore, for purposes of this Policy, the Stakeholders are grouped into the following categories (in alphabetical order):

- Business Partners
- City's internal departments
- Couriers
- Customers
- Employees
- Local communities
- Media
- Merchants
- Municipalities and authorities
- Nature
- NGOs
- Shareholders and investors
- Suppliers (incl. workers in the value chain)

2a. InPost perceives the natural environment as a silent Stakeholder and strives to integrate its perspective and interests in decision-making and business operation. Acknowledgment, consideration and mitigation of the impacts on the natural environment will be ensured by engagement with diverse parties that one way or another represent nature in various Stakeholder groups already identified by InPost.

<b>Stakeholder</b>	<b>Channels of communication</b>	<b>Frequency of engagement</b>	<b>Key topics</b>
<b>Business Partners</b>	Online meetings, phone calls, e-mail, direct meetings	Daily	Project support, organising press conferences, valuation of event activities, valuations of initiatives.
<b>City's internal departments</b>	Online meetings, phone calls, e-mail, direct meetings	Daily	Parcel machine deployment within projects, land selection, contentious urban locations, eco/smart initiatives, processes, contract workflow and signature, valuation of initiatives.
<b>Couriers</b>	Morning briefings, direct contact, push notifications via dedicated app (branch and HQ level), Internet Messenger, surveys	Daily	Current information on the proposition. Trainings, test and reviews.
<b>Customers</b>	Post social media and digital tools (websites, mailing, app, newsletter), traditional and online advertising campaigns, PR channels	Daily	Presentations of new products, services and initiatives. Handling complaints and suggestions.
<b>Employees</b>	Intranet, mailings, InPost News, InTalk, posters, screens	Daily	Business updates (financial results, targets, new projects etc.). New products and solutions launch. HR updates and new benefits.
<b>Local communities</b>	Online meetings, phone calls, e-mail, direct meetings	Depending on entity, varies from a few times a week to several times a year	Establishing cooperation. Charity initiatives.
<b>Media</b>	PR channels, InPost, social media and digital tools	Daily	Information on a new proposition, solutions, business results. Replies to media inquiries.
<b>Merchants</b>	InPost social media and digital tools (websites, mailing, apps), advertising and educational campaigns, surveys, direct contact	Daily	Current information on services provided and the proposition.

<b>Municipalities and authorities</b>	Online meetings, phone calls, e-mail, direct meetings	Daily	Broadly understood cooperation within the InPost Green City programme and beyond, servicing cities after they have joined the programme.
<b>NGOs</b>	Online meetings, phone calls, e-mail, direct meetings	Several times a month	Participation in working groups.
<b>Shareholders and investors</b>	Meetings, online communications, briefings	Daily	Business updates (performance, future financial expectations, capital allocation ect.).
<b>Suppliers (incl. workers in the value chain)</b>	Mailing, online meetings, direct meetings, fairs, informal networking	Daily	Current information the proposition. Terms of trade.

Table 1: InPost's Group Stakeholders

3. The Group strives to guarantee a structured and continuous dialogue with its Stakeholders using a variety of instruments that can operate on a continuous basis (for example, internal communication with its staff, interaction with clients via mobile app, etc.) or undertaking ad hoc initiatives.
4. In order to achieve business objectives and effectively implement local and Group-wide ESG strategies, coordination of market activities is required, accompanied with development of action plans to build appropriate relationships with selected Stakeholders and a Group-level approach must be developed.
5. As relations with selected Stakeholders are built on the local level, the relevant action plans are developed on the local level.
6. Within the scope of engagement, it is crucial to determine the most important groups of Stakeholders and reflect the outcomes in action plans for each of the markets. The prioritization of Stakeholders may be conducted in relation to the market in general or to any particular matter in local action plans. Stakeholder prioritization is based on analysis of such factors as type of Stakeholder, their expectations and needs, impact level, importance to the strategic goals and business operations, current relationship with Stakeholders, etc. The process is facilitated by the use of various instruments (for example, power-interest matrix, Stakeholder map, etc.). The ranking of Stakeholders according to the relevant characteristics is systemically reviewed and adjusted.
7. The aforementioned identification of Stakeholder groups is reflected in the management process and the governance structure.
8. Even though stakeholder engagement is carried out throughout the entire InPost Group, the Board of Directors retains the ultimate authority to decide at its discretion on a case-by-case basis who the relevant Stakeholders of the Group are and who to enter into dialogue with.

9. Requests from Stakeholders to enter into a conversation at the level of InPost S.A. will be taken into consideration by the Board of Directors. The Board of Directors reserves the right to accept invitations only for those conversations with relevant Stakeholders where it deems this in the interest of the InPost Group.

## § 6

### Stakeholder governance structure

1. Our governance structure is designed to ensure that Stakeholder views and needs are communicated to the Board of Directors and their input is integrated into strategic processes if and as appropriate.
2. Stakeholder management is based on annual action plans that include:
  - an assessment of the quality of relations with Stakeholders and their development
  - business objectives of the cooperation
  - ways of mitigating negative impact, if identified
  - ways of mitigating risks arising from the cooperation, if identified
3. The ESG Steering Board is the top-level governance body responsible for the appropriate Stakeholder management. The Board reports annually to the ESG Committee of the Supervisory Board.
4. The ESG Steering Board:
  - Approves the Group-level Stakeholder-related action plan, including KPIs selected to assess the quality of Stakeholder relations and business KPIs
  - Is informed on country-level Stakeholder-related action plans
  - Approves reports on the implementation of the Stakeholder-related action plans at both levels
  - Decides on the input to be included in the strategic and risk management processes.
5. The Chief Marketing and ESG Officer is the person in charge of direct oversight of Stakeholder management.
6. The Chief Marketing and ESG Officer:
  - Approves the Group-level Stakeholder-related action plan, including KPIs selected to assess the quality of Stakeholder relations and business KPIs
  - Is informed on country-level Stakeholder-related action plans
  - Supervises and reviews progress of the implementation of the Stakeholder-related action plan at both levels
  - Reports to the ESG Steering Board (twice a year) and to the ESG Committee (once a year)
  - Keeps the ESG Steering Board informed about new kinds of negative impact or risks
  - Recommends inputs to be included in strategic and risk management processes.
7. Each market appoints a local Coordinator. The tasks of the Coordinator include:
  - Development of Stakeholder-related action plans at the country level
  - Alignment of Stakeholder-related action plans at the Group level with ESG strategy management and other local coordinators



- Overseeing and reviewing progress in the implementation of the Stakeholder-related action plans at both levels
  - Reporting to ESG strategy management
  - Keeping the ESG strategy management informed about new kinds of negative impact and risks
  - Collecting data necessary for materiality assessment and annual reporting
8. Stakeholder owner, as the person accountable for maintaining engagement with particular Stakeholder on a local level, is responsible for day-to-day contact with a given Stakeholder. The owner's tasks include:
- Development of an action plan regarding the Stakeholder
  - Implementation of the action plan
  - Reporting to the local coordinator
  - Informing the local coordinator of new kinds of negative impact or risks
  - Preparing data necessary for materiality assessment and annual reporting
9. The ESG strategy management body is the intermediary between the local coordinators and the Chief Marketing and ESG Officer. The body:
- Is kept informed on Stakeholder-related action plans implemented at the market level
  - Recommends the Stakeholder-related action plan at Group level in cooperation with local coordinators
  - Oversees and reviews progress in the implementation of the Stakeholder-related action plans at both levels
  - Reports to the Chief Marketing and ESG Officer
  - Reports new kinds of negative impact or risks to the Chief Marketing and ESG Officer
  - Coordinates the preparation of data necessary for materiality assessment and annual reporting.
10. To ensure that employees responsible for relations with Stakeholders are highly competent, InPost will provide training for all functions identified in the governance structure.

## **§ 7**

### **Stakeholder management**

1. The Stakeholder management process includes the following steps:
  - Committing to due diligence
  - Identifying impact
  - Reacting to impact
  - Monitoring implemented measures
  - Communicate how different kinds of impact are addressed
  - Access to remedy.
2. The process applies to both human rights due diligence and the analysis of any other InPost impact observed in the value chain.
3. The purpose of the process includes remediation of negative impact, if identified.
4. The ESG Steering Board ensures that Stakeholders are provided with feedback on relevant issues, concerns or any other matters in a timely and sound manner and decisions that affect the relation with a given Stakeholder are made in a balanced and effective manner while respecting their interests.



If a Stakeholder learns about any negative impact or risk related to his relationship with InPost, he may contact InPost using dedicated contact channels for the group of Stakeholders he represents (appropriate e-mail addresses, telephone numbers used in current communication with InPost)..

## **§ 8**

### **Regulatory framework**

1. This policy is drafted in accordance with the InPost Group policies, procedures and best practices to ensure compliance with relevant legislations. If local laws or regulations establish stricter requirements, we will comply with such stricter requirements.
2. InPost Group will adopt a Stakeholder-inclusive approach that balances the needs, interests and expectations of the material Stakeholders with the interest of the InPost Group through a Stakeholder-inclusive approach.
3. InPost Group is committed to ensuring compliance with the applicable regulatory framework in its various operating jurisdictions, including but not limited to current and future legislation on ESG matters, due diligence and stakeholder engagement. In addition, InPost Group is committed to ensuring compliance with protocols and guidelines in various operating jurisdictions to the extent they are legal, ethical and consistent with its values and governance.

## **§ 9**

### **Engagement Consideration and Methodology**

1. Specific engagement methodologies to be employed are discussed for each of the key engagement areas below. Necessarily, specific methodologies chosen have been, and will continue to be, country- and context-specific. As such, they are not outlined in the Policy.
2. However, each Stakeholder-facing function in each country, while determining the appropriate engagement techniques to be used for a given engagement objective and type of Stakeholder, will take into account the following:
  - when engaging with Stakeholder representatives, verify that they are legitimate advocates of their constituents' views and can be relied upon to accurately communicate the results of engagement with InPost Group;
  - special engagement efforts may be required to ensure that vulnerable Stakeholders are reached and engaged with meaningfully;
  - engagement methods should be diversity-sensitive;
  - engagement needs to happen in such a way that Stakeholders feel free of manipulation, interference, coercion, or intimidation.

## § 10

### **Stakeholder Engagement Responsibility**

1. Every Staff member and Stakeholder contributes to the goodwill of InPost. Communication and engagements with various Stakeholders are encouraged within the guidelines of the policies, capacity and mandates.
2. The various operations across all countries of operation will have country- and operations-specific Stakeholder engagement plans and the Business Unit Managers will be responsible for engagement at site level. Market and Group-wide Stakeholder engagement plans are approved by the ESG Steering Board. ESG Steering Board is also responsible for the supervision of Stakeholder engagement plans implementation.
3. Anyone acting on behalf of the Group in Stakeholder engagements should first ensure that they are duly authorized to do so. This includes the sharing of Group information on social media platforms by staff members, suppliers or contractors that have not been specifically authorized to act on behalf of the Group.

## § 11

### **Stakeholder Engagement Risks**

1. InPost Group recognizes that there are risks associated with poor Stakeholder relations and expectation gap management at different levels of the business and its value chain, including intra- and inter-Stakeholder conflicts. While some of these Stakeholder conflicts may be indirect, they could have a direct impact on InPost's business operations. Structured proactive Stakeholder relations management is key to sustainable shared value-based outcomes.
2. Capacity to effectively manage Stakeholder relations may be constrained either at Stakeholder level or within InPost Group. Board of Directors, Executive and General Managers of InPost Group companies must ensure that InPost Group is appropriately resourced and must provide necessary support to facilitate capacitated Stakeholders in engagement processes.
3. Our commitment to conduct operations in accordance with our values and proactively build awareness among our staff members and Stakeholders about risks of corruption, conflict of interest and other forms of misconduct is reflected in the Group's Anti-Corruption Policy which provides practical guidance on licit and ethical behavior. The Group's Anti-Corruption Policy is available on our website.
4. We apply appropriate prioritization, based on risk assessment, in stakeholder mapping processes and approaches to cooperation and engagement. This will ensure that the greatest attention is paid to the interests/influence of high-impact stakeholders.

## § 12

### **Guidance on evaluating and communicating the outcomes of the Stakeholder engagement**

1. In order to ensure successful Stakeholder engagement, generate all benefits, and identify potential improvement areas, it is essential to evaluate the quality of Stakeholder engagement. The InPost Group shall systematically monitor and evaluate the overall quality of its Stakeholder engagement. Therefore, the local coordinators and Stakeholder owners will evaluate the quality of individual engagements including monitoring and evaluation of:
  - commitment and integration with Stakeholders;
  - purpose, scope and Stakeholder participation;
  - process (planning, preparing, engaging, acting, reviewing and improving);
  - outputs and outcomes related to the established stakeholder engagement KPIs;
  - reporting.
2. The quality evaluation will be used to adjust the current engagement activities, if applicable. The outcomes and implications (KPIs) of Stakeholder engagement for InPost Group will be communicated externally and internally.
3. InPost publicly reports, in accordance with the requirements for non-financial reporting, about the significant impact on the interests, views and rights of key stakeholders, and their impact on InPost's strategy and business model (reference to the annual report and the website – ESG pages).