



InPost Group

# Human Rights Policy

# Policy information

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## 1 Our values

At InPost Group, we conduct our business in an ethical and lawful manner, and we are committed to ensuring that human rights are respected and taken into account in every aspect of our business. This principle applies to our customers, employees, partners and any other stakeholders. We are committed to constantly improving the quality of our services without losing sight of the impact we have on the environment and local communities.

## 2 Human rights in the Compliance System

Our commitment to respecting human rights is embodied in a number of compliance policies that draw on international regulations and standards.

The Code of Conduct is the core policy for the InPost Group and sets the framework for other policies. It encompasses core values such as integrity, anti-corruption, ethical and respectful relations with third parties, the promotion of a discrimination-free environment, support for diversity and equal treatment and respect for human rights.

The Anti-Fraud Policy introduces a zero-tolerance approach to any corrupt behaviour and describes fraud prevention mechanisms to ensure our stakeholders' right to equal treatment; these are primarily principles of fair dealing in business relationships and procedures for preventing and managing conflicts of interest among staff members.

Anti-harassment and anti-discrimination policies and diversity policies support the creation of a safe working environment, which is free of prejudice and open to diversity.

The Whistleblower Policy outlines the rules for reporting breaches of the law and our policies, and indicates the available reporting channels.

In the Human Rights Policy (the "Policy"), we have chosen to encapsulate the core values relating to human rights and emphasise our commitment to upholding them.

### **3 International standards for the protection of human rights**

The principles expressed in this Policy are based on international regulations and standards for the protection of human rights. We comply with the provisions of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights, the Ten Principles of the United Nations Global Compact, the UN Guiding Principles on Business and Human Rights, the International Labour Organisation Convention, the Declaration on Fundamental Principles and Rights at Work, among others.

We are also involved in promoting other relevant standards, as expressed in documents such as the Convention on the Rights of the Child, the UNICEF Principles on the Rights of Children and Business, the UN Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families, the Beijing Declaration related to women's rights, the UN Convention on the Rights of Persons with Disabilities, the OECD Guidelines for Multinational Enterprises.

### **4 Minimum standards of protection**

Our commitment to respecting and protecting human rights extends to all places and sectors in which we do business. In doing so, the Policy establishes minimum standards of conduct. In the event that country-specific regulations are more stringent, local regulations will apply. Where local laws conflict with this Policy and international human rights standards, we will strive to ensure that they are respected to the fullest extent permissible under national law.

### **5 Commitment to comply with this Policy**

The Human Rights Policy is a document that is publicly available on the Company's websites: [www.inpost.eu](http://www.inpost.eu) and [www.inpost.pl](http://www.inpost.pl) and internally on the Intranet, and is also communicated to our employees, partners and other business partners, allowing all stakeholders easy access to its up-to-date content.

In addition, we regularly remind staff members of the values and principles set out in this Policy, including by organising regular training and education programmes to ensure that they are fully understood and applied on a daily basis.

We expect our employees and partners to comply with the principles contained in the Policy. Their breach may result in disciplinary measures, depending on the seriousness and nature of the breach. Blatant or repeated breaches may result in termination of the cooperation.

## **6 Human rights in the value chain**

We are aware of the impact we have not only ourselves as the InPost Group, but also our partners, and we actively promote this approach throughout the value chain. Our Suppliers<sup>1</sup> and Business Partners are obliged to comply with the standards set out in this Policy, as well as in the [Code of Conduct for Suppliers](#), respectively, and additionally – for the Polish market – in the [Code of Conduct for Partners](#). They should also ensure that those working with us through them also operate in accordance with these standards. We reserve the right to monitor compliance in this regard.

## **7 Our commitments in the area of human rights**

### **Prohibition of forced labour and trafficking in human beings**

We oppose forced labour and exploitation in any form. The contracts we conclude are voluntarily agreed upon by the parties and may be terminated in accordance with applicable law. We regulate the rules of cooperation in an unambiguous, clear manner expressed in language that our employees and partners can understand. We are not guided by deception, physical or psychological coercion, nor do we take advantage of the other party's weaker position to gain any advantage. Migrant workers undertaking work on our behalf are treated equally with other workers.

We apply transparent recruitment policies and bear the costs ourselves, and we do not charge job or co-operation candidates any fees, make unlawful deductions or withhold wages. We strongly oppose any form of restriction on freedoms or freedom of movement, including the retention of documents or the taking of deposits and bails to obtain, maintain or terminate employment. We comply with the provisions of the International Labour Organisation Convention.

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<sup>1</sup> The term "Supplier" refers to any firm, partnership, corporation, person or other entity that sells or seeks to sell any services or goods to InPost or any of its subsidiaries; including employees, agents and other representatives of the Supplier

## **Prohibition of child labour**

We do not use child labour. We do not employ people below the legal age limit in the country or in a way that prevents compulsory schooling.

Employees under the age of 18 may not perform overtime or night work, or work that may endanger their health or safety, is hazardous or deprives them of the opportunity to attend school.

## **Safe and hygienic working conditions**

We make every effort to protect the health and lives of our employees and co-workers by ensuring safe working conditions. To this end, we implement appropriate procedures and protective measures to eliminate occupational accidents among all persons employed and cooperating with InPost, as well as those residing in the area of our operations.

In addition, we aim to increase the knowledge and competence of our employees in terms of their own and others' safety and to further improve our occupational health and safety management system. We are pursuing this objective through offering regular trainings, among other things.

## **Prohibition of discrimination**

We treat all people with respect and dignity. We make the utmost effort to create a workplace free of discrimination, where diversity is an asset and equality is the cornerstone of our operations. We do not tolerate discrimination, bullying, harassment or any other behaviour that could undermine an individual's sense of self-worth or comfort.

We are committed to not discriminating against any person on the basis of race, gender, age, sexual orientation, gender identity, ethnicity, disability, religion, religious belief or any other reason. Our aim is to create a space where diversity is a strength, not a barrier.

Detailed policies and procedures to ensure diversity, equality and inclusion are set out in our separate [DEI Policy](#).

## **Gender equality and equal pay**

We aim to create a working environment in which all employees, regardless of gender, are treated fairly and rewarded according to their skills and commitment. This is a key step towards building an organisational culture based on respect, inclusion and equal opportunities.

We are aware of the under-utilisation of women's potential in the labour market, and it is therefore crucial in our view to promote the principles of equity and gender equality. We aim to offer equal pay to men and women, regardless of function or job category. Equal pay is the cornerstone of a fair working environment, which is why we are taking action to close the gender pay gap, recognising that these differences are often the result of deep-rooted stereotypes and structural inequalities.

We place a strong emphasis on discovering and developing the talents of women in recruitment processes. Aware that women often face difficulties in the labour market due to discrimination, we are taking steps to counter this phenomenon.

The DEI Policy in force at InPost aims to eliminate all forms of wage discrimination. The policy places particular emphasis on equal pay, regardless of gender, and promotes diversity in the workplace, allowing equal access to opportunities for development and promotion.

### **Remuneration**

At InPost, we place a strong emphasis on complying with regulations regarding pay and working conditions. We provide our employees with working conditions in line with international standards and relevant ILO conventions.

Our approach to remuneration is based on transparency and equality. We set the remuneration in a fair and adequate manner, taking into account not only the applicable legislation setting the minimum wage, but also market standards. Wages are paid on time and at a rate that allows employees to meet their living needs.

Along with their salary, employees receive a salary slip containing full and understandable information on salary components, bonuses and allowances and deductions.

### **Working time and work-life balance**

We comply with working time legislation. We respect our employees' right to rest, leisure time and need for a work-life balance.

We have a variety of programmes in place to support employee well-being, which is crucial for both employee health and well-being and long-term commitment and satisfaction.

We provide training on how to effectively manage work-life balance. By constantly monitoring the solutions used, we can respond appropriately to the changing needs of our employees and the market.

### **Right of association**

At InPost, we recognise the right of our employees to establish workers' organisations, including trade unions, to engage in collective bargaining and the right to bargain collectively and to strike in accordance with applicable law, including ILO Convention 98. Our priority is to guarantee conditions for all workers to freely exercise their rights without fear of any form of intimidation or repression, regardless of the country in which they carry out their work duties, while respecting local regulations.

### **Support for people with disabilities**

We strive to create an accessible and welcoming environment for people with disabilities – our employees and partners, customers and other stakeholders. We are gradually adapting our spaces, services, products and technologies to meet the needs of and be accessible to all users. We provide equal employment opportunities and aim to eliminate barriers by promoting a culture of inclusion and support.

### **Impact on local communities**

We are committed to acting with respect and sensitivity towards local communities in the places where we operate. Our aim is to build lasting relationships based on trust and mutual understanding. We take into account and respect the traditions, cultures and needs of the local population, seeking to minimise any potential negative impact of our activities.

### **Responsible communication and marketing**

We conduct our marketing communications responsibly and to the highest ethical standards. Our marketing messages are honest, fair and transparent and do not mislead the audience. We do not reproduce harmful stereotypes or use content that is offensive to any social or cultural group. We promote a message that emphasises human rights, in particular diversity and equality for all people.

### **Right to privacy and protection of personal data**

We respect everyone's right to privacy and are committed to protecting the personal data of our customers, employees, business partners and anyone else whose data we process. We have included detailed information on the processing of personal data in our [Privacy Policy](#).

## **8 Implementation of the human rights protection strategy**

We have implemented and continuously improve procedures to protect human rights. We proactively prevent their violation by providing training and communicating our values both to our employees and partners within the organisation and to external stakeholders. We make the establishment and maintenance of cooperation with other actors conditional on their respect for human rights. We undertake to implement due diligence in the organisation of the audit process in accordance with the applicable legislation.

We respond appropriately to cases of irregularities identified, implement corrective measures and draw consequences from offenders.

We aim to reduce our negative impact on the environment and society. We have included details in this regard in our [ESG Strategy](#).

## **9 Responsibility to protect human rights**

The implementation of the Policy is the responsibility of the Management Board of InPost SA and the Boards of the individual InPost Group companies with the support of the local HR and Compliance departments. Its implementation is supervised by the Supervisory Board of InPost SA, in particular by the Audit Committee as part of its tasks.



## 10 Reporting violations

We are committed to ensuring that human rights violations do not occur in our organisation. However, due to the scale of our business and the wide range of entities we work with, we are exposed to the risk of irregularities. We encourage anyone who directly experiences or becomes aware of violations to let us know. We also accept anonymous reports on possible violations.

To this end, we have established both group and local notification channels. We identify them both in group policies, including [Whistleblower Policy](#), [Anti-Fraud Policy](#) and [Anti-Harassment and Anti-Discrimination Policy](#), and in policies in place at individual InPost Group companies. We inform our employees, colleagues and business partners about the reporting channels and procedures. Such information is also available on our website.

The reports may be submitted, among others:

- on the [SpeakUp](#) platform,
- by post to the address of the company concerned,
- to the group email [compliance@inpost.pl](mailto:compliance@inpost.pl) or [compliance@inpost.eu](mailto:compliance@inpost.eu) or local email addresses.

Individuals who report a violation or breach in good faith are protected against retaliatory measures. Details of reports and the procedures for dealing with them are set out in the [Whistleblower Policy](#) and the [Anti-Harassment and Discrimination Policy](#).

## 11 Final provisions

### **Adoption and updating the Policy**

Respecting and protecting human rights is one of the pillars of building a sustainable and responsible business.

We believe that the implementation of an effective human rights strategy must be the result of a shared commitment from all stakeholders in our organisation. We have involved staff from all the relevant teams in this area in the development of this policy. This ensures that the Policy not only meets the requirements of the law, but also reflects diverse perspectives and experiences. We use the support of internal and external experts in the development of the Policy and our strategy.

The Policy was approved and adopted by a resolution of the Management Board of InPost S.A. It is subject to regular reviews to ensure that it is up to date and complies with the law, at least once a year. Any change to the Policy will be published on InPost's website and communicated to our employees, partners and other business partners.

### **Stakeholder dialogue**

We are developing our strategy for the protection of human rights by listening to the voices of our stakeholders in ongoing dialogue sessions. We understand the importance of InPost's activities for all our stakeholders in the economic, social, human rights and environmental areas, which is

why we have adopted a [Stakeholder Engagement Policy](#) that sets out a framework for transparent and trust-based collaboration.

## **Reporting**

We publish information on progress in implementing the provisions of the Policy and the Human Rights Strategy in our annual report. In this way, we provide investors and other stakeholders with a full view of our activities and achievements, which allows us to build long-term relationships based on trust.