

InPost Group

Anti-Harassment and Anti-Discrimination Policy

Owner of the Policy	Compliance Officer, HR
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1. WHO IS COVERED BY THIS POLICY

This Anti-Harassment and Anti-Discrimination Policy, which we later call the "Policy", applies to the staff of InPost Group companies, i.e. employees and co-workers or business partners at every level of the organisation.

When we write 'we' or 'our', we mean the InPost Group, i.e. InPost S.A., based in Luxembourg, and its related companies.

2. WHAT THIS POLICY IS ALL ABOUT

We want to create a working environment where there is no discrimination, harassment, bullying or any other abuse. In this Policy, we describe the principles and procedures by which we aim to prevent such negative developments.

Your contribution to creating a safe working environment is crucial. That is why, we ask you to comply with the Policy and, above all, to behave ethically and respectfully towards others – including co-workers, customers, suppliers, business partners, government bodies and their employees.

If you have any questions about the Policy, please contact your local HR office.

3. WHAT IS WORKPLACE HARASSMENT

Workplace harassment means actions or behaviours:

- concerning an employee or directed at an employee of an InPost Group company,
- consisting of persistent and prolonged harassment or intimidation of an employee,
- causing the employee to have a low opinion of their professional suitability, causing or intended to cause humiliation or ridicule of the employee, isolating him or her or eliminating them from the team of co-workers.

Below you will find examples of unacceptable behaviour in the workplace:

- unwanted physical contact (from unwanted touch to physical aggression),
- jokes, offensive or derogatory language, looks, gestures, gossip, slander or blackmail,
- visual presentations (e.g. calendars with pictures of naked people, offensive photomontages/fakes)
- offence to religious feelings,
- isolation and lack of cooperation in the workplace,
- using pressure to cause a specific behaviour that is not acceptable to the affected person (e.g. sexual behaviour, but also shouting, insults),
- invasion of privacy through intrusion, spying, persistent harassment (stalking).

Such behaviour is categorically prohibited in the InPost Group.

If the actions or behaviours described here are of a persistent and prolonged nature, they may be considered as workplace harassment. **Remember, however, that even if they are short-lived or sporadic, they can still breach our Policies. In such cases, even when no harassment or bullying formally happens, we will be able to draw disciplinary consequences of the offenders.**

Protection against breaches applies to all our employees and co-workers.

Please remember that it is not workplace harassment if we expect you to comply with our regulations and standards of behaviour or give you feedback in relation to your duties – on condition that we maintain the culture of speech and principles of respect.

4. WHAT IS DISCRIMINATION

Discrimination means treating employees unfairly, for example:

- the unlawful deprivation or restriction of someone's employment rights, or
- unequal treatment of staff members without a valid substantive reason, for example on the grounds of:

- sex,
- gender identity,
- sexual orientation,
- age,
- religious beliefs or not having religious beliefs,
- political views,
- marital status,
- race,
- ethnic background,
- nationality,
- trade union membership,
- nature and duration of employment (fixed-term or permanent employment, full-time or part-time employment),
- health condition, or
- disability.

Protection against breaches covers all our employees and co-workers.

The prohibition of discrimination also covers candidates in the recruitment process. HR offices have internal guidelines in this respect. In the recruitment process, they make hiring decisions based only on merit, such as education, experience and the skills we require for the job. We treat candidates with the same qualifications equally, regardless of their personal circumstances.

5. WHAT IS WORKPLACE HARASSMENT AND SEXUAL HARASSMENT

5.1. Workplace harassment means unwanted conduct that is intended to violate an employee's dignity (or has the effect of doing so) and creates an intimidating, hostile, degrading, humiliating or offensive atmosphere towards the employee.

These can include various taunts, inappropriate remarks or unwanted jokes. We consider the use of offensive language to be a particularly harmful type of harassment. We do not accept the use of offensive terms towards other people.

5.2. Sexual harassment is a type of harassment that is sexual in nature or relates to the sex of the employee.

It may involve solicitation of sexual contact, particularly if it exploits an advantage or a business relationship, such as that between a superior and a subordinate. It also includes teasing with sexual overtones, as well as the presentation of pornographic content (e.g. drawings or calendars on walls).

5.3. Local laws

Local laws may differ, for example, on the definition of workplace harassment, discrimination and their consequences. They take precedence over this Policy.

Workplace harassment, discrimination and sexual harassment are categorically prohibited in the InPost Group.

6. PREVENTING DISCRIMINATION, SEXUAL HARASSMENT AND WORKPLACE HARASSMENT

At InPost, you are protected against harassment, discrimination, sexual harassment and any other breaches. This is due to the law and our Compliance Policies.

We proactively take measures to prevent breaches:

- we provide regular training,
- we promote behaviour and values consistent with this Policy,
- we use open communication in management,
- we promote the principle of mutual respect and oppose any behaviour that may lead to abuse,
- integrate staff to create an open working environment, and
- we regularly monitor relationships between members of the staff.

Monitoring involves, for example:

- analysis of reported cases,
- anonymous surveys,
- analysis of the structure and relationships in the InPost Group to detect possible risks.

The HR Director is responsible for continuous monitoring and is required to report any notified or noticed breaches to the Compliance Officer.

We aim to provide a workplace where every member of staff feels comfortable. We are open to your suggestions on how we can create an even better working environment.

7. PROCEDURES IN THE EVENT OF REPORTED OF DISCRIMINATION, SEXUAL HARASSMENT OR WORKPLACE HARASSMENT

If you believe that a case of discrimination, workplace harassment, sexual harassment or other abuse has occurred, you can report it to us.

7.1. Notification channels

Report breaches using group or local reporting channels. These may vary depending on the InPost Group company. You can read more in local policies.

You can report the breach **directly to the Supervisory Board of InPost S.A.** – exclusively in matters concerning members of the management or supervisory boards of InPost Group companies.

You can report breaches anonymously. If you choose to leave your contact details, this will help us with the investigation. This will allow us to contact you and get the missing information if necessary.

7.2. Investigation

We will investigate the reported alleged breaches of this Policy as part of the investigation. We will conduct the proceedings with due diligence, confidentiality, fairness and objectivity.

For more details on specific procedures, please refer to the applicable local policies, including anti-harassment and anti-discrimination policies and whistleblowing policies.

7.3. Protection of individuals reporting breaches

You can report abuse without fear of being met with retaliation, i.e. negative action in response to a report. **However, you are only protected in this way if you make a notification in good faith, i.e. in the reasonable belief that a breach has occurred.** Persons assisting in processing the case (e.g. witnesses) also benefit from protection,

We may take disciplinary action against those who deliberately make false notifications.

7.4. Support for the person experiencing workplace harassment, discrimination and sexual harassment

We are aware that workplace harassment, discrimination and sexual harassment can lead to mental health disorders such as lowered self-esteem or anxiety. We can assure you that any person who is a victim of workplace harassment, discrimination and sexual harassment will be treated with appropriate care and empathy by the individuals investigating reports. Whenever possible, an HR representative with expertise in psychology will be involved in the investigation to provide appropriate support.

7.5. Corrective measures in case of identified breaches

If we find that breaches have occurred, we will apply disciplinary measures appropriate to the breaches (e.g. warning, reprimand or even termination of employment).

8. FINAL PROVISIONS

The policy is part of the InPost Group's Compliance System. It is also an appendix to the Group's Code of Conduct.

Individual companies in the InPost Group may have separate policies governing the matters covered in this Policy in a more stringent or more detailed manner. Such policies will be appendices to this Policy. It is your responsibility to comply with the policy adopted by the company where you are employed.