

InPost Group

# Code of Conduct

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<b>Owner of the Policy</b>	Compliance Officer
<b>Approval Authority</b>	Management Board
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<b>Policy objective</b>	Document setting out the fundamental principles and guidelines governing InPost Group's approach to ethical behavior, integrity, and compliance across all business activities

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## 1. WHO THE CODE OF CONDUCT COVERS

The Code of Conduct, which we later call the "**Code**", applies to the staff of InPost Group companies, i.e. our employees and co-workers, regardless of their position.

When we use terms such as "**we**" or "**our**", we mean the InPost Group, which includes InPost S.A., based in Luxembourg, and its related companies.

## 2. WHAT I WILL LEARN FROM THE CODE

We act with integrity and transparency and in accordance with the law, the highest standards of professional ethics and good practice.

The Code is a set of standards of behaviour and guidelines of conduct. It will help you make the best decisions and actions based on our values. The Code is complemented by other policies and procedures governing the InPost Group.

Familiarise yourself with the Code and remember to comply with it. If you have questions about the Code, ask the local or Group Compliance Officer. Keep in mind that breaking the Code may lead to consequences, including termination of employment.

## 3. PROFESSIONAL ETHICS

We expect you to act in accordance with the highest standards of professional ethics and good business practice.

Follow these principles in your actions:

- **Act honestly and responsibly when making decisions and taking action.** Always keep our good name in mind. Avoid any circumstance that could harm the InPost Group or lead to a breach of the law or the Code.
- **Show respect for other people.** We do not accept workplace harassment, discrimination or sexual harassment. You will find detailed rules on how to prevent these abuses in **the Anti-Harassment and Anti-Discrimination Policy**, which is an appendix to this Code.
- **When dealing with third parties** (e.g. business partners, suppliers, customers), **act in good faith and act responsibly and with integrity**.
- **If you are involved in financial reporting, follow established accounting policies and procedures.** Take care of the integrity of InPost Group's accounting records. Always provide InPost Group's auditors with comprehensive information.

## 4. COMPLIANCE WITH THE LAW AND REGULATIONS

We expect you to comply with the laws and regulations of the InPost Group company where you are employed. If you are in doubt, please get advice from the relevant legal department or local Compliance Officer within the InPost Group.

Pay particular attention to the issues we describe below.

### 4.1. Competition and antitrust action

You may not provide our competitors with any information regarding the activities of InPost Group companies. This applies to information that may breach competition and antitrust laws, for example:

- costs,
- pricing policies,
- service conditions,
- future locations of Parcel Lockers<sup>®</sup>,
- market share.

### 4.2. Money laundering and terrorist financing

Illegal activities include:

- **money laundering**, i.e. the legalisation of money or other valuable items obtained from illegal activities, and
- **terrorist financing**, i.e. the transfer of money or other items of value to individuals and groups engaging in terrorism.

You must not take part in these activities. Also be cautious when interacting with other people or entities. Report any suspicious situations immediately to the Compliance Officer.

Please refer to the **Anti-Money Laundering and Countering the Financing of Terrorism Policy** for detailed rules on AML and terrorist financing.

#### **4.3. Proceedings against InPost Group companies**

You have a duty to co-operate with the authorities during investigations conducted against InPost Group companies. You must not obstruct, interfere with or improperly influence such proceedings. If you learn about an investigation that is not part of the company's normal business activities, inform your supervisor immediately

#### **4.4. Bribery and corruption**

You may not offer, pay, demand or accept bribes or other benefits. Nor may you use others to do so. If you suspect corruption or fraud, report it immediately to the Compliance Officer.

Detailed rules on the prevention of bribery and corruption can be found in the **Anti-Fraud Policy**, which is an appendix to this Code.

#### **4.5. Insider Trading**

You may not use inside information in trading in securities of InPost S.A. (shares or derivatives). The exception is when such trading is permitted by law. Report instances of insider trading immediately to the Compliance Officer.

Detailed rules on the prevention of insider trading can be found in the **Insider Trading Policy**, which is an appendix to this Code.

#### **4.6. Human rights**

We comply with international and national human rights laws and regulations. This is also important to us in our business relationships. We ensure that there are no cases of child labour, forced labour, discrimination or other breaches within the InPost Group or among our customers or partners. You can find detailed information in the **Human Rights Policy**.

### **5. INPOST GROUP PROPERTY**

Look after our business property that we have given to you (e.g. mobile phone, computer, car). Maintain the highest standards regarding the storage of our documents.

#### **5.1. Business property**

You may use the business property entrusted to you for private purposes, but remember:

- Official property is used primarily for the performance of official activities.
- You have a duty to prevent theft of entrusted property and to protect company secrets.

Do not use property for:

- undertaking illegal activities,
- take actions that may cause offence to others or endanger the InPost Group, and
- conducting business or obtaining other personal benefits.
- Follow the policies or procedures on the use of company property that are adopted by the company where you are employed.

#### **5.2. Documents relating to the InPost Group**

For documents relating to the InPost Group:

- Ensure that they are stored, disclosed and disposed of in accordance with the law and our policies.

- You must not conceal, alter or destroy these documents or any part of them.

## 6. HEALTH AND SAFETY AT WORK

We are committed to providing you with safe and hygienic working conditions. You also have certain responsibilities in this area:

- Comply with the health and safety rules and regulations of the company where you are employed, and
- Report immediately to your supervisor or local health and safety manager:
  - accidents and injuries, or
  - unsafe practices or conditions.

## 7. CONFLICT OF INTEREST

### 7.1. What is a conflict of interest?

We take measures to prevent conflicts of interest. Conflicts of interest are divided into two types:

- **Internal conflict of interest** - arises when a member of staff is a supervisor of a close relative (e.g. relative, partner), which may affect the treatment of other staff; and
- **External conflict of interest** - arises when a member of staff uses their position to favour an outsider (e.g. a client, supplier or other business partner) with whom they have a personal relationship (e.g. a relative, partner).

### 7.2. Specific rules to prevent conflicts of interest

- **Additional employment and other activities outside the InPost Group:** You may participate in lawful and legitimate activities outside the InPost Group (including undertaking additional employment), if:
  - it does not conflict with or negatively affect your work at InPost Group (e.g. it is not performed during working hours at InPost);
  - it does not include employment or provision of services as an officer of a competitor of the InPost Group.

If you plan to be a member of the management or supervisory body of a for-profit entity, notify such activity and obtain written consent in advance from the relevant InPost Group company. Request such consent if your activity could potentially breach your obligations towards InPost Group.

- **Financial interests in other entities:** Without the express consent of InPost Group, you may not benefit financially in a way that would breach your obligations to InPost Group. Disclose in accordance with the applicable Anti-Fraud Policy when you or a person close to you benefits from the activities of our competitor or activities for such an entity.
- **Abuse of position or official position:** You must not benefit yourself or others by abusing your position or official position. You should also avoid situations that create the appearance of a conflict of interest, as these may have a negative impact on the reputation of the InPost Group.
- **Funding by InPost Group companies:** InPost Group companies:
  - may not fund any political party or candidates for political office, and
  - may not finance or promote activities related to the sale of alcohol, tobacco or other goods that endanger public health.

### 7.3. Procedure for declaring conflicts of interest

Events of potential or actual conflicts of interest are reported immediately to the local or Group Compliance Officer. Detailed rules for preventing conflicts of interest are in the **Anti-Fraud Policy**, which is an appendix to this Code.

## 8. COMPANY SECRET

Keep confidential and do not disclose information that is a company secret of InPost to third parties. This includes information about our business, property, shareholders, business plans, organisation or finances. You may only disclose information covered by company secrecy if required to do so by law.

## 9. YOUR OBLIGATIONS UNDER THE CODE

- Your responsibilities:
  - **Comply with the provisions of this Code.** Always act with due diligence, in particular when representing InPost to other entities.
  - **Take part in compliance training** - initial training, for new employees, and periodic training. We organise such training courses at least once a year, either onsite or online. The trainings end with a knowledge test.
- InPost Group's governing bodies:
  - They ensure that the Code and other policies of the Compliance System are communicated to you.
  - Together with the Group Compliance Officer, they periodically review the Compliance System and the way it operates. Together with the supervisory authorities, they support the Group Compliance Officer and ensure their independence. They provide the Group Compliance Officer and local Compliance Officers with the necessary resources, including sufficient funding and qualified support staff.
  - They pass a resolution adopting the Code if required by law.
  - They adopt Compliance Policies governing in detail the relevant issues covered by this Code.

## 10. COMPLIANCE AND MONITORING

The InPost Group Compliance Officer is responsible for the Compliance System in the InPost Group. They are supported in this by the local Compliance Officers.

### 10.1. Below you will find additional information about the InPost Group Compliance Officer function:

- **Place in the organisation:** The Compliance Officer is independent to the fullest extent possible and reports directly to the Management Board of InPost S.A. or, in matters concerning the Management Board, to the Supervisory Board of InPost S.A. The Compliance Officer may not perform any other function within the InPost Group, in particular executive functions, except for the function of Legal Director or Chief Legal Officer.
- **Appointment:** The Compliance Officer is appointed by the Management Board of InPost S.A. InPost S.A. may appoint a Deputy Compliance Officer who will report to the Compliance Officer.
- **Competence:** The Compliance Officer must have the relevant experience, knowledge and competence to manage and maintain the Compliance System.
- **Absence of the Compliance Officer:** If the Compliance Officer is absent, their tasks may be temporarily taken over by a designated Board Member. If a vacancy occurs in the position of Compliance Officer or if the Compliance Officer is absent for an extended period of time, the Management Board of InPost S.A. will appoint a new Compliance Officer.

Companies in the InPost Group may appoint local Compliance Officers to be responsible for the Compliance System in their respective company. In this case, reports should be made to the local Compliance Officers. The local Compliance Officers report to the Group Compliance Officer.

### 10.2. Responsibilities of the Compliance Officer

The Compliance Officer is responsible for:

- management, periodic review and updating of the Compliance System,
- monitoring the compliance system ,

- handling reports on the Compliance System,
- maintaining confidentiality in matters relating to the Compliance Scheme,
- conducting compliance training for staff.

### **10.3. Monitoring and reporting**

The Compliance Officer keeps a register of breaches. The Audit Committee of the Supervisory Board of InPost S.A. monitors the Register of Breaches. The Compliance Officer reports quarterly to the Audit Committee of the Supervisory Board.

## **11. HOW TO NOTIFY A BREACH OF THE CODE**

**If you become aware of breaches, notify them to the Compliance Officer through group or local reporting channels. These may vary depending on the InPost Group company. You can read more in the Whistleblower Policy.**

You can submit your report anonymously. If you choose to do so under your name, the Compliance Officer will not disclose your details to third parties unless you have given your consent.

### **11.1. Investigation**

The Compliance Officer can investigate suspected breaches of the Code. If the Compliance Officer asks for your assistance, provide it to the fullest extent possible. Maintain the confidentiality of the information gathered in such an investigation.

In the event of a breach of the law, the Compliance Officer will notify the competent authorities and cooperate with them if necessary.

### **11.2. Personal data**

The Compliance Officer is authorised to process, to the extent necessary, personal data collected while maintaining the Compliance System, Compliance training and investigations. The legal basis for data processing is the legitimate interest of the InPost Group and individual companies.

### **11.3. Prohibition of retaliation**

You do not have to fear negative consequences as a result of reporting a breach. However, you are only protected if you act in good faith. The existence of good faith will be assumed if, at the time of the notification, you had reasonable grounds to believe that the reported information was true and that a breach of the Code had occurred.

Knowingly false reports, e.g. retaliation, are a serious breach of this Code and may lead to disciplinary responsibility (even termination of cooperation).

## **12. FINAL PROVISIONS**

The Code, together with the following Appendices, make up the InPost Group Compliance System:

- Anti-Fraud Policy;
- Anti-Harassment and Anti-Discrimination Policy;
- Diversity, Equity and Inclusion Policy;
- Whistleblower Policy;
- Insider Trading Policy;
- Policy against Money Laundering and Terrorist Financing (applies to InPost Group companies in Poland);
- Business partner verification procedure (applies to InPost Group companies in Poland).

InPost Group companies may have their own Compliance policies. This may result from local legislation. Such policies will be appendices to this Code. It is your responsibility to comply with the policy adopted by the company where you are employed.