

Human Rights Policy of Arlen S.A.

1. Policy objective

Arlen S.A., as a public company operating in the strategic sector of defence and national security, recognises respect for human rights as the foundation of responsible business conduct. Our approach is based on the principles set out in the UN Universal Declaration of Human Rights, the International Labour Organization (ILO), as well as the UN Guiding Principles on Business and Human Rights (UNGPs).

The purpose of this Policy is to describe Arlen's obligations and responsibilities and Arlen's expectations towards its business partners with respect for human rights in all of Arlen's activities, value chain and business relationships.

This Policy applies to all employees, directors and managers in the Arlen Group. The minimum human rights requirements for Arlen's business partners – including suppliers, contractors and service providers – are set out in the Arlen Supplier Code of Conduct. Arlen encourages and supports its business partners to continuously improve and develop their practices beyond these minimum requirements in order to meet the human rights standards and expectations set forth in this Policy.

2. Commitment to respect human rights

Arlen is committed to respecting and protecting human rights in all of its activities and business relationships. We are committed to promoting and respecting human rights in our operations, supply chains, and the communities in which we operate.

3. Prohibition of forced labour and human trafficking

We counteract and oppose forced labor, human trafficking, pimping, as well as prison labor, with the exception of rehabilitation programs paid at or above the minimum wage in a given country, in our Company, affiliated companies and among co-workers. We respect the free choice of the form of employment.

4. Prohibition of child labour

We do not use children to work in our Company or related companies. We do not employ people who have not reached the age of entry into work in the light of the International Labour Organization Convention. According to International Labour Organisation Convention No. 138, the minimum age of

an employee shall not be lower than the age at which compulsory schooling ceases or below the statutory minimum age of admission to employment, whichever is more restrictive, but not less than 15 years of age. This also applies to training and apprenticeships. Additionally, work that may endanger health, safety, or morals should not be performed by persons under the age of 18. Any confirmed cases of child labour in the workplace must be investigated and documented, and countermeasures must be applied.

5. Preventing Harassment

Arlen creates and maintains a work environment free from harassment, intimidation, bullying, or stalking. We prohibit any form of physical, sexual, psychological, or verbal harassment. Arlen's employees are obliged to treat each other and all persons associated with the company with respect and dignity

6. Equality and diversity

Our goal is to promote equal opportunities and diversity and to counteract all discrimination and harassment in the work environment. We counteract discrimination based on race, color, nationality, ethnicity, language, social origin, property, trade union membership, religion, sex, age, sexual orientation, disability, birth, genetic features, political opinions, form of employment or any other characteristic. Internal decisions concerning employment and cooperation, such as employment, training, or promotions, among others, are based solely on objective criteria, while respecting the right to equal protection against discrimination.

7. Safety and health in the workplace

Arlen is committed to ensuring safe and healthy working conditions for all employees. We strive to minimize the risk of accidents, occupational diseases and threats to the mental health of employees. We comply with relevant occupational health and safety regulations and standards and provide appropriate training in this regard.

8. Employment and working conditions

Arlen provides employees with decent employment and working conditions in accordance with international labor standards. We comply with the regulations on working hours, wages, breaks in working time, rest between shifts, sick leave, annual leave and parental leave. We prohibit wage deductions as a disciplinary measure.

9. Trade unionisation and collective bargaining

Arlen respects the right of employees to form and belong to trade unions and the right to conduct collective bargaining. We provide employees with full freedom to express their views and beliefs related to trade unions, without fear of reprisals, corporate, government or social censorship.

10. Privacy

We respect the privacy and dignity of everyone who enters into business relations with us. We take care of the protection of personal data by informing about the processes of collecting, sharing, storing, transmitting and deleting this data. We comply with all applicable data protection laws.

11. Supply chain monitoring

Arlen conducts regular social audits of its supply chain to ensure compliance with human rights standards. We work with our suppliers to identify potential risks and implement corrective actions when human rights violations are identified.

12. Environment

With the right of all of us to access safe, clean water and air, we take responsibility for how our actions affect the climate and the environment. That's why we minimize our environmental footprint throughout the value chain.

13. Cooperation with the local community

Arlen engages in open dialogue with the communities affected by our business. We strive to incorporate their perspectives and concerns into the decision-making process and design preventive, mitigating and corrective actions. We work with local communities to solve problems together and contribute to local development.

14. Deployment and monitoring

Arlen shall establish appropriate structures and procedures for the effective implementation and monitoring of this Human Rights Policy. We regularly assess our human rights activities and make necessary adjustments to ensure effectiveness and compliance with our commitments.

15. Audits and assessments

Arlen conducts regular audits and assessments, both within his organization and in the supply chain, to monitor and evaluate compliance with human rights. The results of these audits are the basis for corrective actions and controls to ensure effective human rights enforcement

16. Training and communication

Arlen provides human rights training to its employees, contractors and suppliers to raise awareness and ensure compliance with our standards. We regularly communicate with our stakeholders to inform them about our human rights efforts and encourage them to engage in dialogue and exchange information.

17. Reporting violations

This Policy is a specification of the guidelines contained in **the Code of Ethics of Arlen S.A.**, therefore reporting potential violations is carried out according to the same principles. In addition, detailed rules for reporting violations are described in **the Whistleblowing Policy**.

Applications can be submitted:

- a) to a supervisor or a higher-level supervisor (in the case of reports made by employees or associates of ARLEN S.A.),
- b) directly to the **Ethics Ombudsman** (in any case) at: etyka@arlen.com.pl or the Office of the Management Board of Arlen S.A., 17 A. Branickiego Street, 02-972 Warsaw,
- c) In matters requiring legal interpretation, support is provided by **the Legal Department of Arlen S.A.** at prawny@arlen.com.pl or the Office of the Management Board of Arlen S.A., 17 A. Branickiego Street, 02-972 Warsaw.

18. Final provisions

This Policy enters into force on 1 October 2025 and is effective until it is repealed or replaced by a new document.

The Policy is subject to annual review and updating by the relevant organizational units of Arlen S.A., taking into account regulatory and organizational changes and best market practices.

The Management Board of Arlen S.A. is responsible for supervising the implementation and effectiveness of the application of the provisions of this Policy.