

Anti-Mobbing and Anti-Discrimination Policy of Arlen S.A.

1. Introduction

Arlen S.A. is committed to creating and maintaining a working environment based on mutual respect, equality and dignity of each person. The Company does not accept any form of mobbing, harassment, discrimination or other unequal treatment in employment. This Policy is part of the ESG management system and is linked to other internal documents of the Company, in particular the **Occupational Health and Safety Policy, the Human Rights Policy, the Diversity and Inclusion Policy**.

The Policy applies to all employees, members of management bodies, co-workers, suppliers, subcontractors and business partners of Arlen S.A., regardless of the form of cooperation and place of work.

Detailed rules and step-by-step procedures in cases of mobbing and unequal treatment are described in the internal **Procedure for Counteracting Mobbing and Unequal Treatment in Employment**.

2. Definitions

Mobbing – actions or behaviours concerning or directed against an employee, consisting in persistent and long-term harassment or intimidation, causing a low assessment of professional suitability, aimed at or resulting in humiliation or ridicule of the employee, isolating him or eliminating him from the team of co-workers.

Equal treatment in employment – the prohibition of discrimination against an employee in any way, directly or indirectly, in particular on the grounds of sex, age, disability, race, religion, nationality, belief, trade union membership, ethnic origin, religion, sexual orientation, type of contract or length of working time.

Direct discrimination – a situation in which an employee in comparable circumstances is, was or could be treated less favourably for one or more of the reasons indicated above.

Indirect discrimination – an apparently neutral provision, criterion or action puts workers in a protected group at a particular disadvantage, unless it is objectively justified by a legitimate aim and proportionate means.

Procedure - Procedure for counteracting mobbing and unequal treatment in employment adopted by ARLEN S.A. containing detailed information on reporting violations.

3. Rules applied in areas at risk of mobbing and discrimination

3.1. A work environment free from mobbing and discrimination

Arlen S.A. provides working conditions that counteract all forms of mobbing and discrimination. This means actively eliminating behaviour that violates dignity, as well as promoting attitudes based on respect for diversity and equal opportunities. Every person employed or cooperating has the right to a safe, supportive and friendly working environment.

The Company recognizes that the obligation to counteract mobbing and discrimination rests with both the employer and each employee. Counteracting includes education, responding to irregularities, and consistently enforcing the principles set forth in this Policy and Procedure.

3.2. Equality in recruitment, promotions, pay and access to training

HR processes are carried out on the basis of objective and verifiable substantive criteria. These criteria are designed and applied in a way that does not create an unjustified differentiation in the situation of employees or candidates.

An acceptable differentiation is possible only if it results from a real and decisive professional requirement, or serves to protect parenthood or disability, or is based on the criterion of seniority, in accordance with the rules set out in the Procedure.

3.3. Responding to undesirable behaviour and the duty to cooperate in proceedings

Any person who experiences or observes undesirable behavior should immediately report this fact through the channels specified in this Policy and in the Procedure. Reports – including anonymous reports – are admissible and processed without undue delay, respecting the principles of confidentiality and impartiality.

All employees are obliged to cooperate in the course of clarifying the case, including appearing when summoned by the committee, sharing necessary information and refraining from actions that obstruct the proceedings.

3.4. The role of managers and responsibility for organizational culture

Executives are responsible for shaping an organizational culture based on respect, transparency, and equality. Managers are obliged to react immediately to signals of irregularities, to provide support to whistleblowers and to cooperate with the relevant units in the course of investigations.

Lack of proper reaction or supervision over subordinate teams, resulting in toleration of undesirable behavior, may constitute a breach of official duties and lead to disciplinary consequences – in accordance with the approach adopted in the Arlen S.A. Policies.

3.5. Protection of whistleblowers and prohibition of retaliation

Arlen S.A. provides full protection of persons reporting violations in good faith against any repression, including threats, intimidation, discrimination, loss of promotion or deterioration of working conditions. The protection also applies to witnesses and persons cooperating in the investigation of the report.

Retaliation is strictly prohibited and may result in disciplinary liability. In the event of suspicion of retaliation, this fact should be reported immediately to the Ethics Ombudsman or through the channels indicated in the chapter "Reporting violations".

3.6. Confidentiality, personal data and fair investigations

All reports and proceedings are conducted confidentially, with limited access to information – only for authorized persons – and with respect for personal data protection regulations. Proceedings are impartial and the parties are guaranteed the right to be heard and access to the file in the manner and to the extent specified in the Procedure.

3.7. Requirements for contractors and the supply chain

Arlen S.A. expects contractors and business partners to comply with the principles of equal treatment and non-discrimination. In its contractual relations, the Company promotes ethical and compliance standards comparable to the requirements imposed on its own employees, consistent with the approach used in other Policies.

In the event of violations found on the part of a business partner, the Company may apply the remedies provided for in the agreement, including termination of cooperation, while ensuring the safety and support of persons affected by undesirable behavior.

4. 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. Notwithstanding the specific reporting channels under the Procedure, all reports and matters related to this Policy may be addressed:

- 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.

5. 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. together with the Company's subordinate organizational units, it is responsible for supervising the implementation and effectiveness of the application of the provisions of this Policy.