

# Diversity and Inclusion Policy

## Arlen S.A.

### 1. Introduction

Arlen S.A. operates in the spirit of respect for human dignity, equal treatment and full integration of all people who co-create the organization. We strive for a work environment where diversity of experiences, perspectives and identities is a business and social value, and inclusivity is a daily practice. 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 Anti-Mobbing and Anti-Discrimination 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.

### 2. Definitions

**Diversity** – visible and invisible dimensions of diversity between people (m.in. age, gender, gender identity, disability, ethnic and national origin, religion, sexual orientation, family status, professional experience, cognitive style) which, when properly managed, increase innovation, quality of decisions and organizational performance.

**Inclusivity (inclusion)** – consciously shaping a work environment in which everyone has real access to opportunities, resources, information and influence, and diversity is respected and turned into a team advantage.

**Equal opportunities** – fundamental equality of access to recruitment, remuneration, promotions, training, benefits and working conditions, implemented through objective, verifiable criteria and the removal of systemic barriers.

**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.

**Unconscious bias** – automatic associations and judgments influencing decisions, which can result in systemic exclusion.

**Rational improvements** – adequate and proportionate adjustments to the workplace, processes or tools (e.g. support equipment, flexible working hours, alternative format of materials) that allow people with diverse needs to participate fully.

### 3. Diversity and Inclusion Implementation Policy

#### 3.1. Culture of respect and psychological safety

We are building an environment where everyone can freely speak, propose solutions and raise objections without fear of negative consequences. A culture of respect means, in particular, using language free from stereotypes, prejudices and exclusions, and responding to microaggressions and other undesirable behaviours.

Psychological safety is a shared responsibility – both of the board, managers and team members. It is sustained by clear standards of behaviour, consistent enforcement of the rules and the use of remedies in the event of violations.

#### 3.2. Equality in HR processes

The processes of recruitment, evaluation, remuneration and promotion are based on open, substantive criteria adequate to the role. We eliminate systemic barriers (e.g. in role descriptions, selection criteria) and use solutions to reduce the impact of bias (e.g. structured interviews, decision checklists, salary reviews).

Acceptable differentiation may occur only if it results from a real and decisive professional requirement or serves to protect parenthood/disability or is based on a neutral criterion of length of service – in accordance with the principles indicated in the Anti-Mobbing and Anti-Discrimination Policy.

#### 3.3. Availability and reasonable improvements

We ensure digital and physical accessibility of workplaces and materials (m.in. alternative file formats, legible typography, architecturally accessible places). Reasonable improvements are implemented immediately after the need is notified, with respect for privacy and sensitive data.

Managers, HR and employees are jointly responsible for identifying barriers and proposing improvements. In complex cases, specialist consultations may be used, subject to confidentiality rules.

### 3.4. Communication and inclusive language

We use inclusive language in official communications, documents and training materials (e.g. gender-neutral forms, avoiding stereotypes, visual representation of diversity). Errors are promptly corrected and good practices are consolidated in communication guidelines.

We require the same standard in external communication (marketing, PR, recruitment) and in materials provided by partners – in consistency with the ethos and principles derived from other ARLEN Policies.

### 3.5. The role of managers and responsibility for culture

Managers are responsible for identifying inequalities in their teams, correcting them, and promoting equal access to development tasks. They are also tasked with responding promptly to signals of violations and providing support to whistleblowers, including protection against retaliation.

Failure to properly supervise or tolerate conduct contrary to this Policy may constitute a breach of official duties and result in disciplinary consequences – analogous to the enforcement rules adopted in others.

### 3.6. Cooperation with contractors and the supply chain

We require contractors, subcontractors and business partners to respect the principle of equal treatment and counteracting discrimination. In the agreements, we promote provisions guaranteeing D&I standards, in accordance with the ethical model of cooperation referred to in the other Arlen S.A. Policies.

In the event of violations, we reserve the remedial measures provided for in the contract – up to and including termination of cooperation – while providing support to 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:

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

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## 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.