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# **Anti-Mobbing and Anti-Discrimination Policy**

Within the Ailleron Capital Group

Krakow, September 2024

ailleron 

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## Chapter I

### General Provisions

#### § 1

1. This Anti-Mobbing and Anti-Discrimination Policy sets out the preventive measures and the procedure for dealing with the occurrence/ suspected occurrence of Mobbing, Discrimination and/or Harassment and Sexual Harassment, as well as the rights and obligations of Employees in such a situation.
2. The Policy applies to all Employees regardless of their position and form of employment or cooperation.
3. Subject to § 12 point 2 of the Policy, the provisions of the Policy addressed to Employees shall apply to all persons providing work, services or works to the Group Companies on a basis other than employment and to members of the management and supervisory bodies of the Companies.

#### § 2

The objectives of the Policy:

1. Prevention of occurrence of Mobbing, Discrimination, Harassment, and Sexual Harassment in the work environment.
2. Take intervention actions in case of events or suspicions referred to in item 1.
3. Determining the rules of conduct in the event of the occurrence of the events listed in item 1, including drawing the consequences prescribed by law against those who have committed actions bearing the hallmarks of Bullying, Discrimination, Harassment and Sexual Harassment.
4. Support for actions conducive to building positive relationships among Employees.

#### § 3

Subject to § 12 point 2 of the Policy, capitalized terms used in the provisions of the Policy are defined as follows:

**Company** – respectively, each of the companies within the Ailleron Group.

**Employee** - any person involved in cooperation with Ailleron and in projects for external customers of Ailleron regardless of the form of cooperation.

**Policy** - this Anti-Mobbing and Anti-Discrimination Policy applicable to Ailleron Group Companies.

**Ailleron Group** - a capital group that includes the following companies:

- I. Ailleron Joint Stock Company, KRS: 0000385276,
- II. Ailleron Outsourcing Services limited liability company, KRS: 0000349565,
- III. as well as all entities directly or indirectly dependent on Ailleron S.A.

**Board Member** - Member of the Company's board.

**Mobbing** - actions or behaviours related to an Employee or directed against an Employee, involving persistent and prolonged Harassment and/or intimidation of the Employee, causing a lowered professional assessment, aiming to humiliate or ridicule the Employee, isolate them, or eliminate them from the team of colleagues, including actions or behaviour using new technologies, in particular the Internet (cybermobbing).

**Discrimination** - direct or indirect unequal, inferior, unjust treatment of an Employee or group of Employees based on their actual or presumed characteristics of identity, especially gender, gender identity, skin colour (race), national and/or ethnic origin, religion, belief or non-belief, worldview, health status, and degree of fitness, age, sexual orientation, political beliefs, union membership, social and economic status, type of employment.

**Harassment** - unwanted behaviour whose purpose or effect is to violate the dignity of an Employee and create an intimidating, hostile, demeaning, humiliating, or offensive atmosphere towards them.

**Sexual Harassment** - any unwanted behaviour of a sexual nature or related to the gender of an Employee, whose purpose or effect is to violate the dignity of the Employee, particularly by creating an intimidating, hostile, demeaning, humiliating, or offensive atmosphere towards them; such behaviour may consist of physical, verbal, or non-verbal elements.

**Prohibited activity**-any of the following behaviors: Mobbing, Discrimination, Harassment, Sexual harassment.

**Parties to the proceeding** - the person making the Report in accordance with § 7 of Policy and the person accused of engaging in behaviours bearing the hallmarks of Mobbing, Discrimination, Harassment and/or Sexual Harassment.

**Report** - a report made by an Employee or a person cooperating with the Company, indicating the application of actions or behaviours indicative of Mobbing, Discrimination, Harassment, and/or Sexual Harassment towards them or other Employees (persons cooperating with the Company).

**Commission** - collegial body appointed by the Company to consider Employees' complaints.

**Platform** - an interactive electronic platform that allows Employees to make Applications, available at the address indicated each time on the Company's website.

**Compliance Officer** - the designated person within the Group responsible for, inter alia, receiving Reports and performing the tasks set out in this Policy.

## Chapter II

### Responsibilities of the Company and Employees

#### §4

1. The prevention of cases of Prohibited Activities by each of the Ailleron Group Companies is carried out through the following measures:
  - a) Monitoring the situation in the Company for early detection of any activities indicating Prohibited Activity.
  - b) Conducting periodic training and meetings on anti-bullying and anti-discrimination issues.
  - c) Creation and provision of information materials to Employees.
2. In addition to the preventive measures set forth in paragraph 1 above, in the event of the occurrence of a Prohibited Activity, the Company will take intervention measures to immediately eliminate the Prohibited Activity, mitigate its effects, prevent the occurrence of such phenomena in the future, and apply appropriate sanctions to those responsible for such activities.
3. The Company shall, at its own expense, equip the persons performing the tasks specified in this Policy and the Commission with the resources (including materials and premises) necessary to perform their tasks.

#### § 5

1. Ailleron Group obliges all Employees to comply with this Policy.
2. In particular, all Employees are required to:
  - a) to refrain from actions or conduct bearing the hallmarks of Prohibited Activities;
  - b) To prevent others from using actions or behaviors that constitute Prohibited Activity;

- c) respect the personal rights and dignity of other Employees, associates of the Company, customers of the Company and business partners of the Company;
- d) to apply in their mutual relations the principles of social intercourse, culture and ethics in force in the workplace, as well as the principles of kindness and courtesy that guarantee order and the preservation of well-being and mental health;
- e) inform the persons designated in accordance with this Policy of any signs of Unauthorized Activity observed in the workplace;
- f) actively participate in the Company's training courses covered by this Policy and comply with the rules of conduct set forth herein.

## **Chapter III**

### **Anti-mobbing and anti-discrimination procedures**

#### **§ 6**

1. The provisions of this Chapter shall apply subject to § 12 point 2 of the Policy.
2. Each Employee shall immediately report to the appropriate persons designated to deal with Reports any signs of Mobbing, Discrimination, Harassment and/or Sexual Harassment against himself or herself and other Employees.
3. The Ailleron Group shall ensure that the verification of Report is impartial and that the confidentiality and protection of those making the Report is guaranteed.
4. Against the perpetrator(s) of Mobbing, Discrimination, Harassment and/or Sexual Harassment, the Company may apply the consequences provided by law, in particular:
  - a) apply disciplinary consequences, including a warning or reprimand;
  - b) make changes to the terms of the contract, including assigning the performance of other job, services or work;
  - c) terminate the employment relationship, including with immediate effect;
  - d) terminate a civil law, also with immediate effect;
  - e) take other actions provided by law, including reporting the matter to the competent authorities.

**§ 7**

1. Any Employee who believes that actions or behaviours indicative of Mobbing, Discrimination, Harassment, and/or Sexual Harassment have been applied to them, has the right to make a Report.
2. The company has launched internal Notification channels.
3. The internal entity authorized by the Group to accept Applications is a Member of the Board of Directors of Ailleron S.A. and Ailleron Outsourcing Services sp. z o.o. If the matter concerns a Member of the Management Board of the Company, the internal entity authorized by Ailleron to accept Submissions is a Member of the Supervisory Board of Ailleron S.A. Wherever the following part of the Procedure refers to a Member of the Management Board, it shall be understood to mean a Member of the Supervisory Board of Ailleron S.A., if the notification concerns a Member of the Management Board.
4. Application can be made as follows:
  - 1) through direct meeting with a Board Member,
  - 2) via e-mail to a dedicated address: [whistleblowing.board@ailleron.com](mailto:whistleblowing.board@ailleron.com), which can only be accessed by Board Members, [whistleblowing.supervisoryboard@ailleron.com](mailto:whistleblowing.supervisoryboard@ailleron.com), which can only be accessed by Supervisory Board Members,
  - 3) through the alternative channel indicated in paragraphs 6-11 of the Policy.
5. The application should include:
  - a) an indication of the specific actions or behaviors considered by the reporting Person to be a manifestation of Mobbing, Discrimination, Harassment and/or Sexual Harassment, together with a detailed description of the specific situations and circumstances in which the reporting person' opinion they occurred,
  - b) indication the period during which the reported acts or behaviors took place,
  - c) identify of the Employee alleged to have engage in the reported acts or behaviors,
  - d) identify witnesses to the reported acts or behaviors,
  - e) identify any other evidence of the reported acts or behaviors.
6. If the Company obtains information about on Mobbing, Discrimination, Harassment or Sexual Harassment from another reliable source, the Company may, on its own initiative, initiate the investigation procedure referred to in § 8 or take other measures to obtain more detailed information on the case.

7. Any Employee who sees obstacles to reporting directly to a Board Member should and may use an alternative channel.
8. An alternative channel is to send the Application to the address of Ailleron's registered office with the note "not to be opened - to a Member of the Management Board", or with the note "not to be opened - to a Member of the Supervisory Board".
9. Employees wishing to make a Notification should include a detailed description of the Prohibited Activity in the submission.
10. An employee or associate of Ailleron responsible for the handling of correspondence in Ailleron shall immediately notify the receipt of correspondence with the notation "do not open - to a Member of the Management Board" or with the notation "do not open - to a Member of the Supervisory Board" to a Member of the Management Board or a Member of the Supervisory Board, respectively, handing over the correspondence without opening the envelope and without reading its contents.
11. Access to correspondence marked "not to be opened - to the hands of a Member of the Management Board" or marked "not to be opened - to the hands of a Member of the Supervisory Board" shall be granted only to a Member of the Management Board or a Member of the Supervisory Board, respectively.
12. Handling of the Application received through the alternative channel shall be carried out in accordance with the provisions of this Procedure, considering the need to maintain the anonymous nature of the Application.

## § 8

1. The explanatory procedure regarding Mobbing, Discrimination, Harassment, and/or Sexual Harassment is conducted by the Commission.
2. The Commission is composed of:
  - a) the Compliance Officer (if the matter concerns the Compliance Officer, the internally authorized entity is the designated Member of the Board of Directors of the Company concerned by the Report),
  - b) representative of the Employees;
  - c) a person jointly indicated by the Company.
3. A Commission member cannot be:
  - a) a party of the proceeding;



- b) a person in respect of whom allegations of a Mobbing, Discrimination, Harassment and/or Sexual Harassment have been confirmed in the past;
  - c) a person who is the immediate superior of any of the Parties to the proceedings;
  - d) a person who is a direct subordinate of Party to the proceedings;
  - e) a witness called by the party to the proceeding;
  - f) a person who is a spouse, relative or relative by affinity of any Party to the investigation or is in such a legal or factual relationship with a Party to the investigation as to cast doubt on his or her impartiality.
4. The Commission selects a Chairman from its members. The Chairman of the Commission conducts Commission meetings, ensuring their proper course in accordance with this Policy.

## § 9

1. The Chairman of the Commission convenes its first meeting within 7 days of receiving the Report.
2. The Commission should consider the Report within 30 days of its receipt. In cases justified by the circumstances of an individual case, this period may be extended.
3. The Commission may invite third parties to the proceeding who may provide relevant information and evidence.
4. The Commission may require the parties to the proceedings and persons designated as witnesses to provide oral or written explanations.
5. The Commission holds meetings convened by the Chairman according to the possibilities and needs of the ongoing proceedings. A protocol is drawn up for each Commission meeting signed by the Chairman and all members present at the meeting. The protocol template is in Appendix No. 1 to the Policy.
6. Commission proceedings are confidential. The Commission considers the report while adhering to principles of impartiality.
7. In justified cases, the appointment of persons, bodies, or institutions allowing a comprehensive assessment of the situation is allowed.
8. The Commission is authorized to review the necessary documents to clarify the matter.

9. Commission members are obliged to maintain confidentiality regarding all information acquired in connection with the conducted explanatory procedure. A model declaration - confidentiality undertaking is attached as Appendix 4 to the Policy.
10. If, during the procedure, it is necessary to hear witnesses, the Commission will summon them to a meeting. A separate protocol is prepared for each witness containing information provided by that witness, in which the witness confirms the accuracy of the information provided by them regarding the matter.
11. The template for the declaration on the truthfulness of information and materials presented by the witness is in Appendix 2 to the Policy.
12. The witness is obliged to keep confidential all facts and circumstances that they learned aware during the proceedings.
13. The confidentiality obligation of individuals mentioned in § 3-4 also continues after the conclusion of the proceedings.
14. After hearing from the Employee making the Report, the person accused of actions or behaviours having the characteristics of Mobbing, Discrimination, Harassment and/or Sexual Harassment, any witnesses, and after reviewing the evidence collected, the Committee, shall assess the merits of the Report.
15. When deciding on the Report, the Commission may find it justified, unjustified, or conclude that it is unable to conclusively and unequivocally resolve the Report.
16. The fundamental reasons for the decision are recorded in the meeting protocol, signed by all the Commission members (Appendix 1 to the Policy).
17. A Commission member expressing a different opinion on the decision of the Commission may submit a separate opinion from the Commission's decision. A mention of submitting a separate opinion is included in the protocol.
18. The Commission presents recommendations to the members of the Management Board of the respective Company based on which the Management Board members take further steps resulting from the Commission's decision.
19. The Commission shall communicate its reasoned decision to the Parties to the investigation in writing by e-mail with proof of delivery within 3 working days from the date of the Commission's reasoned decision.

## § 10

1. Ailleron ensures a guarantee of protection against retaliatory actions for Employees reporting cases of behaviors indicative of Mobbing, Discrimination, Harassment, and/or Sexual Harassment, or individuals associated with the reporter.
2. Retaliation as referred to in point 1 shall be deemed to be direct or indirect acts or omissions, in connection with the Report, which may cause or do cause harm to the reporting Employee.
3. In the event of retaliation against an Employee making a Report, appropriate legal action may be taken against the person committing the retaliatory action, in particular disciplinary sanctions, admonishments, reprimands or disciplinary consequences, including the initiation of disciplinary proceedings and/or appropriate legal proceedings.

## Chapter IV

### Principles of Personal Data Protection

#### § 11

1. The administrator of personal data collected in connection with proceedings regarding Reports of violations of legal provisions and the protection of reporters is Ailleron.
2. The administrator ensures contact with the Data Protection Officer (DPO). The DPO can be contacted for all matters related to the processing of personal data, especially concerning the exercise of rights related to their processing, either by email or in writing to the administrator's mailing address. The DPO's contact information is available on the administrator's website.

## Chapter V

### Final Provisions

#### § 12

1. The Policy comes into effect on the day it is made known to the Employees.
2. In the event of any discrepancy between the provisions of this Policy and the provisions of the laws of the countries in which Ailleron Group companies have their registered offices, the provisions of that law shall prevail.

3. The content of the Policy shall be made available to all Employees by posting on the Company's SharePoint and by displaying for inspection in the Payroll or the People Department.
4. Ailleron ensures that the policy is regularly updated and adjusted to the changing business environment and legal regulations.

.....  
Employer's signature

**Appendices:**

Appendix No. 1- Model minutes of the Commission meeting

Appendix No. 2- Model declaration on the veracity of the information and materials presented by the witness

Appendix No. 3- Model declaration – undertaking of confidentiality

**Appendix no. 1**

to the Anti-Mobbing and Anti-Discrimination Policy applied at the Ailleron Group.

PROTOCOL NO. 1 OF THE MEETING OF THE ANTI-MOBGING AND ANTI-DISCRIMINATION COMMITTEE

Date: [meeting date].

Start Time: [start time].

End Time: [end time].

Location: [meeting location].

Present:

- 5. [Chairperson's Full Name]
- 6. [Member's Full Name]
- 7. [Member's Full Name]
- 8. [Others present, e.g., witnesses]

Meeting Description:

- 1. Information regarding the Committee's work.
- 2. Updates on the progress of discussions.
- 3. Presentation of evidence.
- 4. Key problematic situations identified during discussions.
- 5. Committee recommendations.
- 6. Closing remarks.

Statement by Committee Members:

All Committee members confirm that the provided information aligns with the course of the Anti-mobbing and Anti-Discrimination Committee meeting.

Signature of the Committee Chairperson: \_\_\_\_\_

Member of the Committee's Signature: \_\_\_\_\_

Member of the Committee's Signature: \_\_\_\_\_

**Appendix no. 2**

to the Anti-Mobbing and Anti-Discrimination Policy applicable in the Ailleron Group

DECLARATION OF THE WITNESS ON THE ACCURACY OF INFORMATION AND EVIDENCE MATERIAL

Date: [meeting date].

Start Time: [start time].

End Time: [end time].

Location: [meeting location].

Present:

1. [Chairperson's name]
2. [Commission member's name]
3. [Commission member's name]
4. [Witness's name]

Description of information and materials provided by the witness:

1. Information provided by the witness.
2. Evidence material.
3. Final remarks.

The witness declares that the information and evidence material presented in the protocol are in accordance with the truth.

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Statement of the Commission members:

All members of the Commission confirm that the presented information is consistent with the course of the meeting of the Anti-Mobbing and Anti-Discrimination Commission.

Signature of the Commission Chair: \_\_\_\_\_

Member of the Committee's Signature: \_\_\_\_\_

Member of the Committee's Signature: \_\_\_\_\_



**Appendix no. 3**

to the Anti-Mobbing and Anti-Discrimination Policy applicable in the Ailleron Group.

CONFIDENTIALITY COMMITMENT

I hereby declare that, as a participant in the Anti-Mobbing and Anti-Discrimination Commission of Ailleron, I commit to maintaining the confidentiality of all facts, information, and circumstances to which I gained access in connection with the conducted Anti-Mobbing proceedings.

I commit to:

1. Not disclose any information or details related to the Anti-Mobbing proceedings.
2. Not use any information or facts related to the proceedings in a harmful manner, violating the good name or causing harm to any party involved in the proceedings.
3. Safely store all documents, notes, or other materials related to the proceedings to prevent unauthorised access by third parties.
4. Not undertake any actions or activities on behalf of third parties that could harm the Anti-mobbing Commission or any of the parties involved in retaliatory actions.
5. I commit to adhere to this commitment both during the proceedings and after its completion, following the applicable legal regulations and company Policy.
6. Violation of this commitment may result in legal and disciplinary consequences according to the company's applicable regulations.

I declare that I have read and understood the contents of this commitment and I am aware of the consequences of its violation.

Date: \_\_\_\_\_

Signature: \_\_\_\_\_