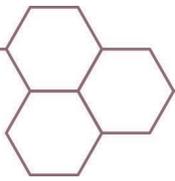


# Nondiscrimination/ Anti-Harassment Policy and Complaint Procedure

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DL INVEST GROUP





## **Nondiscrimination/Anti-Harassment Policy and Complaint Procedure**

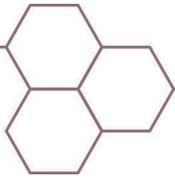
### **Objective**

DL Invest Group is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, [Company Name] expects that all relationships among persons in the office will be business-like and free of explicit bias, prejudice and harassment.

DL Invest Group has developed this policy to ensure that all its employees can work in an environment free from unlawful harassment, discrimination and retaliation. DL Invest Group will make every reasonable effort to ensure that all concerned are familiar with these policies and are aware that any complaint in violation of such policies will be investigated and resolved appropriately.

Any employee who has questions or concerns about these policies should speak with a member of the company's management team or a company employee designated to handle human resources matters.

**These principles should not and must not be used as a basis for excluding or segregating individuals of a particular gender or other protected characteristic from participating in business or work-related social activities or discussions. In other words, no one should make the mistake of engaging in discrimination or exclusion to avoid allegations of harassment. DL Invest Group's laws and policies prohibit disparate treatment on the basis of sex or any other protected characteristic with respect to terms, conditions, privileges and benefits of employment. The prohibitions against harassment, discrimination and retaliation are intended to supplement and elaborate on these principles, not to provide a basis for exceptions to them.**



### **Equal employment opportunity**

It is the policy of DL Invest Group to ensure equal employment opportunity without discrimination or harassment on the basis of race, color, religion, sex, sexual orientation, gender identity or expression, age, disability, marital status, citizenship, national origin, genetic information, or any other characteristic protected by law. DL Invest Group prohibits any such discrimination or harassment.

### **Retaliation**

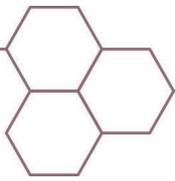
DL Invest Group encourages reporting of all perceived incidents of discrimination or harassment. It is the policy of DL Invest Group to promptly and thoroughly investigate such reports. DL Invest Group prohibits retaliation against any individual who reports discrimination or harassment or participates in an investigation of such reports.

### **Sexual harassment**

Sexual harassment constitutes discrimination and is illegal under Polish law. federal, state and local laws. For purposes of this policy, "sexual harassment" is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or

physical conduct of a sexual nature when, for example, (a) submission to such conduct explicitly or implicitly is a condition of an individual's employment, (b) submission to or rejection of such conduct by an individual is a basis for decisions regarding that individual's employment, or (c) the conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment can include a range of subtle and not-so-subtle behaviours and can involve people of the same or different sex. Depending on the circumstances, these behaviours may include unwanted sexual advances or requests for sexual favours, jokes and allusions of a sexual nature, verbal abuse of a sexual nature, comments about a person's body, sexual prowess or sexual deficiencies, boasting, whistling or touching, offensive or obscene comments or gestures, displaying sexually explicit objects or pictures in the workplace and other physical, verbal or visual behaviour of a sexual nature.



## Harassment

Harassment on the basis of any other protected characteristic is also strictly prohibited. Under this policy, harassment is verbal, written or physical conduct that denigrates or shows hostility or aversion toward an individual because of his or her race, color, religion, sex, sexual orientation, gender identity or expression, national origin, age, disability, marital status, citizenship, genetic information, or any other characteristic protected by law, or that of his or her relatives, friends or associates, and that: a) has the purpose or effect of creating an intimidating, hostile or offensive work environment, b) has the purpose or effect of unreasonably interfering with an individual's work performance, or c) otherwise adversely affects an individual's employment opportunities.

Harassing conduct includes epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes; and written or graphic material that denigrates or shows hostility or aversion toward an individual or group that is placed on walls or elsewhere on the employer's premises or circulated in the workplace, on company time or using company equipment by e-mail, phone

(including voice messages), text messages, social networking sites or other means.

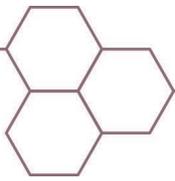
## Individuals and Conduct Covered by the rules

This policy applies to all employees, regardless of whether it concerns behaviour by the employees themselves, co-workers or persons not directly connected with DL Invest Group (e.g. a supplier, consultant or customer).

The conduct prohibited by this policy is unacceptable in the workplace and in any other work-related setting outside the workplace, such as business travel, business meetings and work-related social events.

## Reporting an Incident of Harassment, Discrimination or Retaliation

DL Invest Group encourages you to report any perceived instances of discrimination, harassment or retaliation, regardless of the identity or position of the perpetrator. Individuals who believe they have been the victim of such conduct should discuss their concerns with their immediate



supervisor, any member of management or human resources.

In addition, DL Invest Group encourages individuals who believe they have been the victim of such conduct to immediately inform the perpetrator that his or her conduct is unwelcome and request that it cease. Often this action alone solves the problem. However, DL Invest Group recognises that a person may choose to pursue the matter through the complaints procedure.

### **Complaint Procedure**

DL Invest Group encourages the prompt reporting of complaints or concerns so that prompt and constructive action can be taken.

Any reported allegations of harassment, discrimination or retaliation will be promptly investigated. The investigation may include individual interviews with the parties involved and, if necessary, with individuals who observed the alleged conduct or have other relevant knowledge.

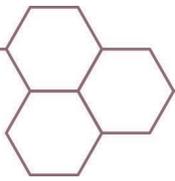
DL Invest Group will maintain confidentiality throughout the investigation process to the extent

necessary to conduct an appropriate investigation and take appropriate corrective action.

Retaliation against an individual for reporting harassment or discrimination or for participating in an investigation of harassment or discrimination is a serious violation of this policy and, like the harassment or discrimination itself, will be subject to disciplinary action. Acts of retaliation must be reported immediately and will be investigated and resolved promptly.

Conduct that constitutes harassment, discrimination or retaliation will be dealt with appropriately. Appropriate action may include, for example, training, referral to counseling, or disciplinary action such as a warning, reprimand, withholding of promotion or salary increase, transfer, temporary suspension without pay, or dismissal, as DL Invest Group deems appropriate in the circumstances.

False and malicious complaints of harassment, discrimination or retaliation (as opposed to complaints that, even if erroneous, were made in good faith) may be subject to appropriate disciplinary action.



This procedure sets out:

- Measures and procedures for employees to report incidents to an individual or supervisor or employer, including specific individuals, so that it is clear to whom it should be reported or complained.
- Means and procedures for employees to report incidents to someone other than a supervisor or individual if the employer or supervisor is the alleged perpetrator of the harassment so that it is clear to whom it should be reported or complained about.
- ✓ If the alleged perpetrator of the harassment is a supervisor, the designated person is the Human Resources representative or Chief Operating Officer.
- ✓ if the alleged perpetrator of the harassment is the employer, the designated person is a Board Member or external health and safety consultant.

1. name(s) of the person making the complaint and contact information.
2. the name of the alleged perpetrator(s) of the harassment, position and contact information (if known)
3. the names of witnesses (if any) or other persons with relevant information about the incident (if any) and contact information (if known)
4. details of the incident, including the date(s), frequency and location(s) of the alleged incident(s)
  - any supporting documents that the employee complaining of harassment may have that are relevant to the complaint
  - a list of any documents that a witness, other person or alleged perpetrator of harassment may have that are relevant to the complaint.

The incident report must include the following information:

*DL Invest Group*

*Katowice, February 2022*