



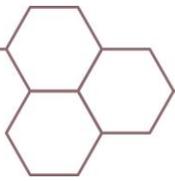
Human Rights and Labor Standards Policy

DL INVEST GROUP

KATOWICE 2022



This document was approved by DL Invest Group Board and executive management. All employees are informed about the contents of this document.



Introduction from our Chairman of the Supervisory Board

- Dominik Leszczyński

DL Invest Group believes that as an organisation it has an obligation to respect human rights and comply with international law. DL Invest Group's values guide the attitudes, behaviours and decisions of all employees in their dealings with our customers, partners, suppliers, the communities in which we work and live, and above all with each other. This Human Rights and Labour Standards Policy is an important and key part of our commitment to these values as it focuses on ensuring that our employees and non-employees around

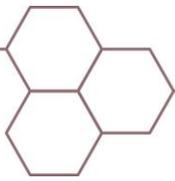
the world are treated with dignity, fairness and respect.

It is my personal commitment to ensure that all of us at DL Invest Group maintain our standards of conduct and respect for each other by setting a personal example and taking an active interest in our performance as individuals and as a team. I am confident that all our employees at DL Invest Group will conduct themselves in the same way.

Dominik Leszczyński

Chairman of the Supervisory Board

DL Invest Group



Human Rights and Labor Standards Policy

This Human Rights and Labour Standards Policy ("Policy") applies to all full-time, part-time and temporary employees ("Employees") and agents, consultants, advisors and other similar independent contractors of DL Invest Group and its subsidiaries "Subsidiaries").

As part of this Policy, the Company has recognised the United Nations Declaration of Human Rights. The Policy is available on the Company's website.

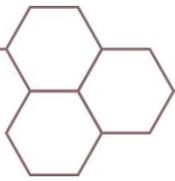
1. Our Code of Conduct and Ethics

DL Invest Group has published its Code of Conduct and Ethics which is communicated to all employees and publicly available on our corporate website. The purpose of the Code is to ensure that all DL Invest Group employees and those

acting on our behalf are aware of the standards of ethical behavior and integrity in all business dealings that are required of all Directors, management and staff. These standards both protect us from business risk and support the development of trust and positive relationships with all business associates, colleagues and partners. The Code of Conduct and Ethics outlines the Company's expectations with regards to personal behavior and respect for individuals.

2. Our Workplace Practices

At DL Invest Group, we strive to attract, engage and retain employees who can help deliver our business strategy in a way which aligns with our core commitment to our core values, ethical conduct and integrity in all we do. We recruit highly competent individuals on the basis of appropriate education, training, skills, and experience. Our commitment to our employees is to respect and uphold their rights in all aspects of their employment and engagement with DL Invest Group. Our approach to creating an ethical working environment stems from a basic appreciation and respect for core internationally accepted labor standards. These employee rights are encompassed in the globally



ratified International Labor Organization's Declaration of Fundamental Principles and Rights at Work which we support, and are enhanced by advanced human resources practices.

3. Employee Rights

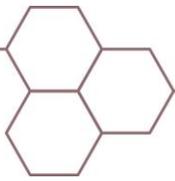
We believe that employees should know their rights in respect of their employment with our Company. Employees join DL Invest Group out of their own free will and in full agreement to the proposed terms and conditions. We do not require any employee to remain in employment for any period of time against his or her will, or use practices which restrict employees' ability to terminate employment. We do not engage in forced labor in any way, and we do not employ children in any part of our business operations. As a minimum, DL Invest Group employees are rewarded in accordance with laws and regulations governing salaries and benefits in Poland, where we operate.

Further, we respect the right of employees to open communication and human and equitable treatment. We maintain open and direct communication with our employees through our Human Resources Department and encourage their full participation in

our business. We provide updates to employees about business activities and results, and all other matters which affect them, or may help them perform their roles more effectively. During the course of employment, management and members of our Human Resources team are committed to responding to all questions or grievances raised by employees relating to terms and conditions, rights and any other matters of concern.

4. Equal Opportunity, Diversity and Inclusion

We strive to maintain an inclusive work culture in which each employee feels respected and valued and has the opportunity to develop and grow in line with business needs and personal aspirations. We offer all individuals equal opportunity to join the Company, and to progress within the Company according to performance and potential. We embrace employees from all possible backgrounds representing different dimensions of diversity which include gender, race, color, religion, nationality, age, sexual orientation, disability, marital status, and other aspects of diversity. We aim to ensure



that our workplace is free of all forms of discrimination, harassment, violence and other behaviors which might negatively impact the workplace experience, such as alcohol or substance-abuse. Company's employees receive periodic trainings on relevant issues relating to anti-harassment and discrimination.

our supply chain. We are guided by respect for internationally recognised human rights, including those set out in the Universal Declaration of Human Rights and the International Labour Organisation's Declaration of Fundamental Principles and Rights at Work. We comply with all applicable laws in all countries with which we do business and treat all persons with whom we interact with respect and dignity.

5. Employee Health and Safety

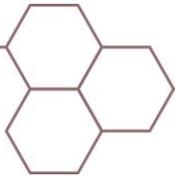
DL Invest Group is committed to providing all employees with a healthy and safe workplace, free from all known health and safety risks. We comply with all laws and regulations relating to employee safety to ensure that safe working practices are followed. We comply with Occupational Health and Safety standards. DL Invest Group has implemented an Environmental Management System based on the standards of ISO 14001:2015 and PN-EN ISO 14001:2015.

6. Human Rights in our Supply Chain

We are committed to respecting the human rights of all those affected by our business activities, particularly employees involved in

7. Supplier Engagement and Contract Operations

We work with outsourced vendors for the supply of our products and components which are manufactured and assembled to our specifications. In general, we cultivate long-term relationships with our outsourced vendors, who are of themselves large national or global, respected business operations that are familiar with our approach to human rights and labor standards. Of necessity, we work closely with our outsourced suppliers enabling us to observe the standards that are maintained and the workplace conditions provided to their employees. We strive to have our outsourced vendors and key suppliers confirm that they observe the following practices which protect labor rights and human rights:



8. Sourcing and Supply

- Respect for employees and treating employees with dignity, applying humane, decent and fair practices. To the extent possible, suppliers will invest in employee training and development.
 - Encourage diversity and avoidance of discrimination in the workplace.
 - Declare support for freely chosen employment and prohibit any form of forced labor.
 - Act in accordance with working hours as defined by local laws.
 - Observe laws and regulations relating to health and safety of employees.
 - Compensate employees in accordance with applicable laws and regulations.
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- Provide formal grievance mechanisms for employees to voice their concerns and receive appropriate acknowledgement without fear of retaliation.

We are committed to sourcing all materials used in our supply chain to manufacture our products in a manner that respects human rights, for example, taking into account the rights of workers employed in the mining industry for the metals and elements used in our products. We expect our suppliers to follow responsible sourcing practices, using verified sources wherever possible.

This Policy may be amended from time to time with or without notice by the Company.