



**InPost Group**

# **Anti-harassment and anti-discrimination policy**

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### 1. OBJECTIVE

This Anti-harassment and anti-discrimination policy is a part of the InPost Group Compliance System and constitutes an Appendix to the InPost Group Code of Conduct (the "CoC").

All terms used herein which are defined in the CoC shall have the meaning attributed to them in the CoC.

The purpose of this policy is to regulate the principles and procedures applied by InPost Group and pertaining to the prevention of sexual harassment, discrimination and workplace harassment.

InPost Group strives to create and ensure a safe work environment free from prejudice, discrimination, harassment, including sexual harassment, and workplace harassment. InPost Group requires all Staff members to exhibit ethical conduct and respect for both colleagues, team members, supervisors, and clients, suppliers and other business partners, as well as authorities and any other third parties.

InPost Group believes that the wellbeing of the Staff in the workplace is a top priority, which is why all Staff members are required to comply with the present Policy in order to help create a safe work environment.

### 2. SCOPE AND ESSENCE

InPost Group does not accept discrimination, sexual harassment, workplace harassment or any other forms of psychological, mental or emotional abuse, as well as prevents and counteracts such behavior.

This Policy is binding on all Staff members.

Forms of harassment include but are not limited to:

- unwanted physical contact (varying from unwanted touch to a serious physical attack);
- verbal or written harassment in the form of jokes, offensive or derogatory language, glances, gestures, rumors and slander or blackmail;
- visual presentations (calendars with nude photos, offence of religious feelings),
- isolation and lack of cooperation in the workplace;
- exerting pressure to generate particular behavior unacceptable by an individual (e.g. sexual);
- violation of privacy by imposing oneself on another individual, spying, stalking.

If at least one of the behaviors listed above occurs on a persistent basis or long-term basis, they constitute workplace harassment.

Harassment shall not include a demand to comply with the principles and procedures of conduct in force in the Group under any circumstances.

The Group prevents the discrimination, harassment, workplace harassment and other forms of mental or emotional abuse, in particular but not limited to:

- by obligating the Management of InPost Group companies to promote behavior consistent with the generally acceptable standards of conduct, as well as by ensuring proper communication in teams operating within the framework of the InPost Group.
- by providing training on preventing and counteracting discrimination, harassment and workplace harassment to all Staff members, including training on consequences of such behavior;
- by means of preventive measures as part of the ongoing Staff management, connected in particular with applying open communication with Staff members;
- by applying the mutual respect principle.
- by condemning symptoms of any form of abuse or behavior which may lead to abuse;
- by means of activities integrating the Staff including, e.g. integration meetings.

### 3. PROHIBITION OF DISCRIMINATION

Discrimination means unlawful deprivation or restriction of rights arising from the employment relationship or unequal treatment of Staff members, due to their:

- sex;
- gender identity;
- sexual orientation;
- age;
- religious beliefs or lack thereof;
- political views;
- marital status;
- race;
- ethnic background;
- nationality;
- trade union membership;
- nature and duration of employment (employment for definite or indefinite period of time, full-time or part-time);
- health condition;
- disability;

as well as granting to some Staff members, for these reasons, fewer rights than the rights enjoyed by other Staff members in the same factual and legal situation.

**Discrimination for any reasons, including but not limited to the ones listed above, is strictly prohibited across InPost Group.**

Potential Staff members (candidates) are protected from discrimination in the recruitment process by internal guidelines introduced by the HR offices in line with rules set out in the Compliance System. In particular, the HR offices are required to adopt merit-based approach and make hiring decisions based strictly on a specific person's fitness for the specific job position, including their

education, prior experience and skills required for the role, including interpersonal skills. The HR offices are required to treat candidates with the same skillset equally, notwithstanding their personal circumstances which could be perceived as grounds for discrimination.

Staff members are protected from discrimination by CoC the present policy, as well as by applicable legal provisions, which are observed by all InPost Group members.

InPost Group acknowledges that lack of sufficient inclusivity may be perceived as discrimination, and is open to any suggestions on how to provide a more inclusive environment for members of minority groups. InPost strives to provide an environment receptive to the needs of all Staff members and is willing to constantly improve in order to ensure that every Staff member feels equally comfortable in the workplace.

Staff members are guaranteed the opportunity and right to notify any and all cases of discrimination to the Compliance Officer or the local HR office. The Compliance Officer and the relevant HR office shall cooperate and investigate all notifications thoroughly and, if need be, take appropriate disciplinary measures against persons involved in discrimination against Staff members, clients, suppliers, authorities or any other third parties.

The Compliance Officer will closely monitor all instances of discrimination and may decide to introduce compulsory sensitivity training for all or selected Staff members. The Compliance Officer may also, at their sole discretion, introduce any actions they deem appropriate and effective in preventing discrimination.

#### **4. PROHIBITION OF SEXUAL HARASSMENT**

**Harassment** means behavior which is vexatious, offensive, violates personal dignity or personal immunity or is undesired in the eyes of its recipient, which may be targeted at an individual or a group of people.

**Sexual harassment** means behavior characterized by the making of unwelcome and inappropriate sexual remarks or physical advances in a workplace or other professional or social situation.

If sexual harassment or workplace harassment have a different legal definition in a given country where one of the InPost Group companies has its corporate office, the legal definition shall apply to Staff members in that country.

InPost Group acknowledges that a safe work environment is environment free from any forms of harassment, including in particular sexual harassment.

InPost Group acknowledges that the use of derogatory language constitutes a particularly harmful type of harassment, and does not tolerate the use of any derogatory language towards their Staff members or the use of derogatory language by their Staff members towards any third parties.

Staff members are guaranteed the opportunity and right to notify any and all cases of harassment to the Compliance Officer or the local HR office. The Compliance Officer and the relevant HR office shall cooperate and investigate all notifications thoroughly and, if need be, take appropriate disciplinary measures against persons involved in harassment against Staff members, clients, suppliers, authorities or any other third parties.

InPost Group appreciates that harassment may lead to mental health issues such as lowered self-esteem or anxiety. Therefore, InPost Group ensures that Staff members affected by harassment will be treated with care and empathy by HR representatives and Compliance

Officer responding to harassment allegations. Wherever possible, an HR representative with background in psychology will be participating in an investigation and offering support to Staff members affected by harassment.

## **5. PROHIBITION OF WORKPLACE HARASSMENT**

**Workplace harassment** means activity or behavior concerning or targeted at an individual that consist of a persistent and long-term harassment or intimidation of said individual, which results in their perception of decreased professional suitability, which causes or is aimed at causing humiliation, ridicule or isolation of the individual or in their exclusion from their work team.

If workplace harassment has a different legal definition in a given country where one of the InPost Group companies has its corporate office, the legal definition shall apply to Staff members in that country.

Staff members are guaranteed the opportunity and right to notify any and all cases of workplace harassment to the Compliance Officer or the local HR office. The Compliance Officer and the relevant HR office shall cooperate and investigate all notifications thoroughly and, if need be, take appropriate disciplinary measures against persons involved in workplace harassment against Staff members.

InPost Group appreciates that workplace harassment may lead to mental health issues such as lowered self-esteem or anxiety. Therefore, InPost Group ensures that Staff members who are affected by workplace harassment will be treated with care and empathy by HR representatives and Compliance Officer responding to harassment allegations. Wherever possible, an HR representative with background in psychology will be participating in an investigation and offering support to Staff members affected by workplace harassment.

## **6. PROCEDURES IN THE CASE OF DISCRIMINATION, HARASSMENT OR WORKPLACE HARASSMENT**

InPost Group ensures that any and all allegations of discrimination, harassment or workplace harassment shall be examined in a confidential, reliable, accurate, and objective manner. A person notifying the Compliance Officer or HR office shall not be threatened with any form of retaliatory action.

Discrimination, harassment or workplace harassment in all forms shall be subject to appropriate disciplinary consequences – starting from an admonition, through a reprimand to termination of employment relationship.

Any and all cases of discrimination, harassment or workplace harassment should be notified to:

- Compliance Officer (by e-mail sent to [compliance@inpost.eu](mailto:compliance@inpost.eu) or [compliance@inpost.pl](mailto:compliance@inpost.pl), by traditional mail or in person); or
- HR office; or
- directly to the Management Board or governing body of a given InPost Group company;
- directly to the InPost S.A. Supervisory Board – only in case the allegations pertain to a Management Board member or member of a governing body of a given InPost Group company;

either via e-mail, in person or via traditional mail and will be thoroughly investigated.

## **7. DISCRIMINATION, HARASSMENT AND WORKPLACE HARASSMENT PREVENTION**

In order to prevent the occurrence of behavior infringing the rules set out herein, InPost Group undertakes to:

- provide training for all Staff members across InPost Group on a regular basis;
- make sure that members of the Management across InPost Group propagate the values set out herein;
- monitor relations between Staff members.

This monitoring may consist, in particular, in:

- an analysis of reported cases;
- conducting anonymous questionnaires;
- an analysis of the InPost Group's structure to eliminate undesired incidents.

HR Director will be responsible for the ongoing monitoring and will report any issues to the Compliance Officer.

In order to prevent discrimination, harassment and workplace harassment incidents, Compliance Officer may take any actions they deem necessary and effective, in particular conducting sensitivity training for all or smaller groups of Staff members.

## **8. FINAL PROVISIONS**

This policy is a part of the InPost Group Compliance System and constitutes an appendix to the InPost Group Code of Conduct.

All questions pertaining to this policy shall be posed either to the local HR office or to the Compliance Officer.

InPost Group may introduce amendments hereto at all times and for any reason whatsoever, with the reservation that such an amendment shall be communicated to the Staff each and every time.

This Policy replaces any and all current internal regulations in place in InPost Group Companies covering the scope hereof, unless such internal regulations are required and strictly governed by local law, in which case such policies shall constitute Appendices hereto and take precedence wherever the provisions hereof are not in line with the relevant legal regulations.

If local legal provisions in countries where individual InPost Group companies have their business seat require more stringent or more comprehensive anti-discrimination or anti-harassment policies, individual policies in line with local legal regulations shall constitute Appendices hereto.