

Policy of Respect for Human Rights

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Preamble

The Company promotes equality as well as values and cares for diversity and dignity of all in its environment while at the same time not tolerating any form of unequal treatment, discrimination or abuse.

The Company's basic ethical values, which are associated with the respect for human rights, are expressed in the following manifesto:

Respect, personal dignity as well as protection and privacy of one's personal and family lives are the rights of every human being.

1. Goals and scope of the Policy of Respect for Human Rights

1. The goal of the Policy of Respect for Human Rights is to assure that the Company's stakeholders:

- 1.1. are aware of and understand the expectations and the declarations addressed to them,
- 1.2. understand what type of acts constitute violation of human rights,
- 1.3. are aware of the consequences of acts leading to violation of human rights,
- 1.4. are aware of the Company's actions undertaken to prevent, detect and eliminate any behavior which constitutes violation of human rights,
- 1.5. are aware of the possibilities of reporting suspected violation of human rights and of the protection to which the persons reporting such situations are entitled,
- 1.6. are aware of the consequences of violating the principles formulated in the Policy of Respect for Human Rights

1. The present Policy of Respect for Human Rights applies to Cyfrowy Polsat S.A. and its subsidiaries as well as all Obligated Entities. If the subsidiaries have their own policies of respect for human rights in place, then such policies may not be contradictory to the present Policy.
2. The Company is not entitled to address any requests or impose any obligations formulated in the Policy of Respect for Human Rights upon its remaining stakeholders, however the Company may expect that in their respective operations these stakeholders will observe the ban on violation of human rights. For these entities the Policy is the declaration of the ethical values of the Company that are associated with respect for human rights and it provides to them the information on the activities undertaken by the Company to ensure effective respect for human rights.

2. Terminology, definitions and additional information

The following meanings of the notions used in the Policy, or having direct relation to the Company's activities in the field of protection of human rights, have been adopted for the purpose of proper understanding of the Policy of Respect for Human Rights:

1. Respect for human rights, protection of human rights – all the activities having the aim of expressing full acceptance for respecting human rights in the company's business

operations, including by preventing any behavior which violates such rights, detection of violations and conducting of corrective actions to eliminate the consequences of the violation and to prevent the possibility of recurrence of such violations in the future,

2. Obligated Party (*Podmiot Zobowiązany*) – a Company’s stakeholder to whom the Company may direct requests or on whom it may impose the obligations formulated in the Policy of Respect for Human Rights. The following are termed as stakeholders:
 - 2.1. current employees,
 - 2.2. potential employees, i.e. the persons who are in the recruitment process,
 - 2.3. trainees,
 - 2.4. volunteers who act for the benefit of the Company, or who are involved in the projects which are being implemented by the Company,
 - 2.5. proxies and representatives of the Company, both current and potential, i.e. those who are in the process of being granted a power of attorney or to whom representation of the Company is being entrusted,
 - 2.6. associates and suppliers of goods or providers of services, irrespective of the type of the contract they have with the Company,
 - 2.7. social organizations which cooperate with the Company,
 - 2.8. business partners, i.e. distributors, advertising brokers, scientific institutions, industry organizations and trade chambers, sports associations, marketing partners, parties cooperating with the Company,
 - 2.9. media, i.e. the press, the Internet, radio, television, influencers who cooperate with the Company, or are in the process of establishing of cooperation with the Company..
3. Policy of Respect for Human Rights – the present Policy of Respect for Human Rights.
4. the Company – Cyfrowy Polsat S.A.
5. System preventing violation of human rights – the Policy of Respect for Human Rights along with comprehensive internal regulations and organizational solutions which have the purpose of assuring fulfilment of the obligation of respect for human rights.
6. Compliance Officer for Human Rights Respect – a person named by the Company’s Management Board for monitoring of the compliance of the Policy with the law and for monitoring the fulfillment of the obligations indicated in the Policy.
7. Ethics Officer – a person who has been authorized by the Company, in writing, to accept the reports of violation of the law in accordance with the Procedure of Reporting of Cases of Offences and Follow-up Actions.

3. General principles of the Policy of Respect for Human Rights

1. The Company is aware of its responsibility for respecting human rights, which it understands as avoiding violation of human rights and prevention of negative

influence that the Company's operations may have on respecting of human rights in a situation when the Company's actions result in their violation.

2. The Company's responsibility relates to the universally recognized human rights which are listed in:
 - 2.1. International Bill of Human Rights which includes:
 - 2.1.1. Universal Declaration of Human Rights,
 - 2.1.2. International Covenant on Civil and Political Rights,
 - 2.1.3. International Covenant on Economic, Social and Cultural Rights,
 - 2.2. International Labor Organization Declaration,
 - 2.3. OECD Guidelines for Multinational Enterprises.
3. Regardless of the feeling of responsibility for respect of human rights, which stems from both, legal rules and moral obligations, the Company is of the opinion that respect for human rights is the necessary condition for its long-term development, the high assessment of its credibility and the basis for the dialogue with its stakeholders. These are the reasons why respect for human rights is one of the fundamental values adopted by the Company its code of ethical conduct.
4. There are certain sets of principles in the catalogue of rules found in the Policy of Respect for Human Rights which the company isolated as: **the Policy of Equality, the Policy of Protection of Diversity, the Anti-Discrimination Policy, the Policy of Protection against All Forms of Abuse, the Policy of Protection of Trade Union Freedoms and the Policy of Protection of a Safe Work Environment.**
5. The Company implements the declarations formulated in the Policy by:
 - 5.1. defining and observing within the Company – including by the Management Board and managers – the rules concerning respect for human rights,
 - 5.2. supporting the Company's activities related to respect for human rights by indulging in pro-social initiatives,
 - 5.3. preventing all cases of violation of human rights through preventive actions as well as detecting and properly responding to all discovered problems. At the same time, the formula of the System preventing violation of human rights and correctness of the system's functioning are verified systematically and modified as needed,
 - 5.4. eliminating the consequences of human rights violations,
 - 5.5. corrective actions taken to prevent human rights violations in the future.
6. Preventive actions, mainly information and training campaigns which build the desired level of awareness of the requirements of the law and the Company's requirements in the field of respect of human rights, as well as monitoring of the social relations within the Company – within the possible scope – and also within the Company's environment are all considered by the Company as a particularly effective form of prevention of human rights violations.
7. While recognizing the priority of pro-active efforts versus the reactive efforts, the Company also recognizes the positive effect of such actions, leading to creation of

attitude of mutual kindness and understanding, which in itself is in many cases a very effective tool for preventing negative behavior leading to violation of human rights.

8. The Compliance Officer for Respect for Human Rights is responsible for planning and implementing the training which addresses the obligations of respect for human rights. Fulfillment of this obligation is subject to annual reporting.
9. The Compliance Officer for Respect for Human Rights is responsible for resolving the doubts related to the implementation of the Policy, while the cases indicated in the Procedure of Reporting of Cases of Offences and Follow-up Actions are the responsibility of the Ethics Officer.
10. Detection of human rights violations is supported by creation of the possibility of reporting all the suspected cases of such issues, by all the stakeholders, based on the Procedure of Reporting of Cases of Offences and Follow-up Actions.
11. The method of investigating and responding to confirmed cases of violations of human rights assumes that all parties are equal from the point of view of the defined principles, irrespective of the job position they hold.
12. Response to confirmed cases of violation of human rights must be adequate to the type of the offence, the value of the loss caused to the Company by the perpetrator's activities, the degree in which the perpetrator is willing to cooperate in eliminating all the negative consequences of their acts.

4. Pro-social actions supporting respect for human rights in the Company

1. The intention of the Company is to amplify the effects of its activities related to respect for human rights by becoming involved in a pro-social charity and sponsoring activities
2. The Company engages in numerous pro-social initiatives in such fields as conservation of natural environment, safety, promotion of sports and physical activity, education – especially in the fields of ecology and promotion of healthy lifestyle – as well as providing aid to children.
3. The following are the examples of consistent, wide-scale pro-social activities:
 - 3.1. involvement in various initiatives aimed at saving the lives and the health of children as well as support for the children in need and those threatened with exclusion (social or economic) – these efforts are carried out in cooperation with public benefit organizations, the Polsat Foundation in particular,
 - 3.2. involvement in the actions which promote safety thanks to long-term partnership and financial support for rescue units (TOPR, GOPR, WOPR and MOPR),
 - 3.3. sponsoring of Polish sports,
 - 3.4. educational and technological projects implemented in cooperation with the Copernicus Scientific Centre in Warsaw (CNK) – Polkomtel Sp. z o.o., a Cyfrowy

Polsat subsidiary, has been the partner of this educational institution since establishment of the Center,

- 3.5. being an active member of the Clean Poland Program Association, an organization whose mission includes initiation of change, education of the society and publicizing of important topics and actions which are associated with ecology, environmental protection and improvement of quality living,
- 3.6. consistent involvement in promotion of sports and healthy lifestyle by, among others, participating in Żyjemy Sportem (Living a Sporty Life) nationwide campaign,
4. The Company boasts of intense involvement in employee volunteering type of activities; every year the employees who are members of Wolontariat group either organize or participate in regular charity actions such as:
 - 4.1. blood donation actions
 - 4.2. Czyste Zielone Miasto (Clean Green City) action,
 - 4.3. Quiet Świątecznego Mikołaja charity Christmas project and a charity Christmas fair,
 - 4.4. activities of the Work Life Balance Section,
 - 4.5. Rękodzieło z Misją handicraft workshops,
 - 4.6. numerous other projects which are focused on supporting people in need and which are carried out in cooperation with such organizations as e.g. Polsat Foundation and Fundacją Polki Mogą Wszystko organization.

5. Policy of Equality

1. The Company expects that the Obligated Parties will eliminate unequal treatment from their activities, with unequal treatment understood as unjustified, different treatment of people who are in a similar factual and legal situation.
2. The Company observes the principle of equality, while continuously making efforts to assure for all persons – regardless of their gender, age, degree of disability, race or ethnic origin, religion or beliefs, or their sexual orientation – fair treatment and participation in all the fields of the Company’s activity on equal terms.
3. In particular, the Company respects the principle that all have the right to be treated equally when searching for a job and – upon becoming employed – to be treated equally in terms of their superiors’ decisions regarding promotion, remuneration and working hours.
4. The following are considered to be instances of violation of the principle of equal treatment of employees when hiring them:
 - 4.1. refusal to enter into an employment relation,
 - 4.2. unfavorable terms of employment, including with regard to base salary or granting of other benefits which are associated with the job,
 - 4.3. not promoting an employee,
 - 4.4. not qualifying an employee for training related to improvement of professional skills,
 - 4.5. termination of employment.

unless such differentiation is justified by objective reasons.

5. The Company applies the principles of equal remuneration for work of equal quality, i.e. for the work which requires comparable professional qualifications, confirmed by relevant documentation or track record and professional experience, and which is comparable in terms of the level of responsibility and the effort required to perform it.
6. Linking the compensation amount to the way the work is performed, including making the compensation dependent on the care, timeliness and effort required to perform the work, shall not be treated as violation of the law.
7. The Company applies the policy of equality of opportunity for women and men, while taking into account the gender perspective in all mainstream business processes, including:
 - 7.1.access to employment,
 - 7.2.career development,
 - 7.3.fighting against the gender-related stereotypes which exist on the labor market,
 - 7.4.work-life balance,
 - 7.5. promotion of equal compensation for the same work.
8. Different treatment shall not be violation of the principle of equality if it is intentional and has the aim of differentiating an employee's situation in such cases as:
 - 8.1.parental status protection or creating equal conditions for the disabled,
 - 8.2.using the criterion of seniority when defining the terms of employment or termination of employment, principles of remuneration and promotion as well as access to training aimed at improving one's professional skills,
 - 8.3. temporary equalization of opportunity for all or for a significant group of employees who are distinctive, due to one or several reasons which enjoy legal protection, by reducing the actual inequality to the benefit of the such employees.
9. The principle of equality will not be violated in a situation when employment is refused due to one or several reasons, enjoying protection under the law, when the type of work or the conditions in which the work is performed require actual fulfillment of specific requirements and fulfillment of these requirements is the decisive reason from the point of view of ability to perform such work.
10. Differentiation of an employee's situation due to a discriminating criterion, including gender, nationality, ethnic origin, age, religion, beliefs, skin color, gender identity or psychosexual orientation is not a case of unequal treatment but discrimination.
11. Exercising by an employee of their rights on account of violation of the principle of equal treatment may not give grounds for any unfair treatment. The principle also applies to an employee who provides support to another employee in such a scope.

6. Policy of Protection of Diversity

1. The Company expects that the Obligated Entities will observe, in their activities, the principles which protect diversity and that they will demonstrate positive attitude to the Company's activities in the field of creating a work environment which values diversity.

2. The Company promotes the idea of diversity by shaping the awareness that diversity is not only about the differences between sexes or sexual orientation. Differences in the areas of personality and age, nationality, ethnic origin, beliefs, religion, place of living or differences in terms of professional experience as well as any other differences which make a given person different from others are a vital aspect of diversity.
3. Every aspect of diversity, which has been mentioned above, may constitute a value for respective groups, communities or organizations. The goal of the Policy of Protection of Diversity is to create the awareness of the positive influence that diversity has on social relations and to include diversity in the set of values which are protected by our organization.
4. Protection of diversity, as understood by this Policy, means development of a strategy and acting in the climate of respect for the differences between individual people. This way the Company creates a work environment in which every employee feels respected and appreciated, which enables them to exploit their potential fully, thus contributing to successful accomplishment of the Company's goals.
5. In the Company's opinion, support for diversity:
 - 5.1. maximizes the opportunities for employing the most gifted people from various communities,
 - 5.2. minimizes the risk of loss of valuable employees from these communities,
 - 5.3. enables development of a corporate culture of openness, tolerance and teamwork,
 - 5.4. facilitates the ability to reach diversified groups of clients with the products and services provided by the Company.
6. To-date practice confirms the Company's belief that supporting of diversity has positive influence on the ability to gain competitive edge, while continuous confrontation of various skills, experiences, work styles as well as exchange of views and opinions foster achievement of better results of work in a better work atmosphere.
7. By building the culture of diversity, the Company strives towards:
 - 7.1. identification and elimination of all stereotypes which violate the principle of protection of diversity, especially in the Company's recruitment policy,
 - 7.2. employing, at all levels of the organization, the policy of openness to all persons, without any racial prejudice or stereotypes,
 - 7.3. diversity in appointing employees to respective positions at all levels of the organization,
 - 7.4. use of communication, both internally and externally, which stresses that diversity is appreciated in the Company and that everyone can find their place here,
 - 7.5. enabling unconstrained communication between all the employees, in a manner which enables overcoming language barriers and limitations, e.g. hearing or eyesight deficiencies - supported by constant needs analysis in this area,
 - 7.6. removal of physical barriers which limit access to workstations for the persons with limited mobility, adaptation of workspace, in the scope possible, to the needs of the people coming from various cultures – supported by constant needs analysis in this area,

- 7.7. cultivation of cultural sensitivity, encouraging mutual contacts in the workplace and outside the workplace to support the understanding and appreciation of the differences between individual people,
- 7.8. dissemination of the policy of tolerance for all forms of diversity,
- 7.9. incorporation into the recruitment process of the principles which foster building an environment which is supportive of diversity by e.g. supporting actions aimed at employing the underrepresented groups or minorities, incorporating in the recruitment team of representatives of diverse groups or minorities,
- 7.10. enabling celebration of days or events which are in a particular way connected with a given group or religion, being tactful in the approach to religious issues, especially the ways of practicing a given religion or celebration of religious holidays,
- 7.11. implementation of the principles of protection of diversity by strongly involving the Management Board and the Company's managers in the matters associated with diversity.

7. Anti-discrimination Policy

1. The notions used herein will have the following meanings for the purpose of proper understanding of the principles applied by the Company in its Anti-discrimination Policy:
 - 1.1. Discrimination – different treatment of various natural persons, who are in the same situation, depending on existence of a discriminating reason (criterion), such as sex, nationality, ethnic origin, religion, beliefs, skin color, gender identity, psychosexual identity.
 - 1.2. Direct discrimination – the type of discrimination in whose case a given person is treated less favorably, due to one or several features, than another person who does not demonstrate these features.
 - 1.3. Indirect discrimination – the type of discrimination in which seemingly neutral conditions, criteria or principles of conduct are applied equally to all but they affect a specific social group in special way.
 - 1.4. Encouraging discrimination – clear encouragement to treat specific people in a less favorable manner due to one of the protected features.
2. The list of discrimination criteria found in the Policy is not finite. Discrimination criteria can include all actual and specific reasons that are essential from social point of view.
3. The Company disallows all forms of discrimination, both direct and indirect discrimination.
4. Coaxing anyone to apply any form of discrimination is treated by the Company as synonymous with using discrimination.
5. The Company expects that the Obligated Entities will observe absolute ban on indulging in or permitting any discriminatory behavior, while expecting analogous attitude from the remaining stakeholders.
6. Due to the fact that discrimination is a form of unjustified and non-objective marginalization of specific social groups based on negative stereotypes, the Company sees

as particularly important the way in which the work environment is shaped as free from any prejudice or stereotypes, where the situation of an employed person is determined on the basis of their work efficiency, competence, professional experience, education as well as any other exclusively objective reasons.

7. Setting a criterion or rules of conduct which create differences in the situation of individual people is not treated as discrimination if such an activity is objectively justified due to a lawful goal which is expected to be achieved, while the means of achieving this goal are proper and indispensable.
8. The Company states that for the needs of proper assessment of all negative behavior, any differentiation of an employee's situation due to a discriminating criterion will not be treated as unequal treatment but as discrimination. This broad interpretation is accompanied by the expectation that the employees' claims related to this scope will be based on a balanced and objective reason while objectively substantiating it.

8. Policy of Protection Against All Forms of Violence

1. The following definitions of terms have been adopted to enable proper understanding of the principles applied by the Company in its policy of protection against all forms of abuse:
 - 1.1. Harassment (*molestowanie*) – any undesirable behavior having the purpose of or resulting in offending the dignity of a natural person and creation of a threatening, hostile, humiliating or disparaging climate. Lack of the harassed person's consent to abusive treatment or objection against the perpetrator's behavior are the necessary conditions for a case of harassment to be confirmed.
 - 1.2. Sexual harassment – any undesirable behavior of sexual nature towards a natural person or related to a person's sex/gender whose having the purpose of, or resulting in offending that person's dignity, especially by creating a threatening, hostile, humiliating or disparaging climate. Lack of the harassed person's consent to abusive behavior or objection against the perpetrator's behavior are the necessary conditions for a case of harassment to be confirmed.
 - 1.3. Mobbing – actions or behavior related to an employee or addressed against an employee which involve persistent and long-term harassment or intimidation of an employee, causing an employee's low assessment of own professional competence, which leads to or is aimed at humiliating or ridiculing an employee, isolating an employee from others or eliminating an employee from the team.
 - 1.4. Hate speech – a form of direct discrimination which involves spreading of statements as well as verbal and non-verbal messages which spread, propagate and justify hate for some specific individuals or groups, most often distinguished out by such features as:
 - 1.4.1. skin color,
 - 1.4.2. ethnic origin,
 - 1.4.3. nationality,
 - 1.4.4. sex,

- 1.4.5. gender identity,
- 1.4.6. psychosexual orientation,
- 1.4.7. age,
- 1.4.8. beliefs.

1.5. Forced or compulsory labor – all work or services requested from a given person when connected with a threat of punishment when a person has not voluntarily agreed to perform such work or services. Military duty or work required from people who have been sentenced, or work required in force majeure situations, or any work performed as fulfillment of one's civic duties do not constitute cases of forced or compulsory labor.

- 2. The Company expects that the Obligated Parties as well as all other stakeholders will demonstrate analogous attitudes while observing absolute prohibition of indulging in or permitting any acts of abuse.
- 3. The Company categorically objects against using child labor, slave labor, or any other form of forced or compulsory labor – in all forms, as well as against human trafficking.
- 4. The forms of abuse which the Company considers as particularly dangerous in the era of the Internet and mass media include hate speech, publication of harmful content on social media, calling for hate or violence, spreading in public of any information, texts, offensive or humiliating images or materials regarding specific people, inciting moods which encourage organized violence.
- 5. Use of hate speech may not be treated as a protected freedom of expression of one's beliefs or opinions.

9. Policy of Freedom of Association

- 1. It is the Company's will to respect all trade union freedoms, including the freedom to join trade unions as well as the right to negotiate and enter collective labor agreements the right to collective disputes – within the limits provided by the national law and international agreements.
- 2. Employee organizations are entitled to develop their own statutes and internal regulations, freely choose their representatives, appoint their boards, operate and develop their programs of operations.
- 3. The Company's acceptance for the right to join trade unions does not only stem from the respect for the law which protects the freedom of joining trade unions but it also stems from understanding that such membership and activity is a manifestation of human individuality, contributes to a person's self-fulfillment as well as expression of their freedom and independence.
- 4. The Company also respects the freedom to leave a trade union and the freedom not to join a trade union organization (the so-called negative aspect of freedom of association) as an element of the freedom of association in trade unions.
- 5. The Company also respects the right of association in trade unions not only by the employees employed on the basis of employment contracts but also by all persons who

perform work for the Company, including the persons employed on the basis of civil law contracts. Also the foreigners working for the Company have the right to be members of trade unions.

6. The Company treats and respects, as a natural consequence of the right to associate in trade unions, the right of trade unions to protect the interests of the persons performing paid labor by means of trade union actions - above all by means consultations, negotiations and entering into collective agreements.
7. The Company respects the trade unions' right to collective actions in the event of conflict of interests, including the right to strikes, subject to the obligations which could be the outcome of earlier collective labor agreements and the laws which regulate the trade unions' right to strike.
8. The Company prohibits any discriminatory practices related to the right to associate in trade unions, for example:
 - 8.1. making approval to hire an employee dependent on that employee's consent not to join a trade union or to stop being a member of a trade union,
 - 8.2. firing an employee or any other negative actions aimed at an employee due to the employee's trade union membership or involvement in trade union activities after hours or, at an employer's consent, during business hours.
9. The Company will abstain from any interference in the creation, functioning, or management of a trade union, including financing of a trade union, in order to acquire control over it or in order to have the persons who remain at the disposal of the Company join the trade union.

10. Policy of Protection of a Safe Work Environment

1. The Company treats care for health and safety of its employees as one of its fundamental duties and as manifestation of its respect for human rights.
2. The Company's actions in the areas of ensuring a safe working environment and care for the employees' health focus on constant improvement of the operation of our occupational safety units as well as on the development of a program of benefits.
3. The tasks of our occupational safety unit include:
 - 3.1. identification and assessment of the threats which have impact on occupational safety,
 - 3.2. verification of the observance of the occupational safety regulations and rules.
4. The activities of the Occupational Safety and Health Committee form an important element of the system of work safety assurance. The Committee includes, in equal numbers, the persons representing of the Company's authorities and the Company's employees.
5. The Occupational Safety and Health Committee's activities include:
 - 5.1. reviews of work conditions,

- 5.2.regular assessment of the state of or work safety and hygiene,
 - 5.3.issuing opinions regarding the measures implemented by the Company to prevent accidents at work and occupational diseases,
 - 5.4.formulation of conclusions regarding improvement of the conditions of work,
 - 5.5. cooperation with the Company in the fulfillment of its obligations related to work safety and hygiene.
6. We also have the Civil Defense Formation (FOC) in the Company. Its existence has largely contributed to minimizing the risk of safety and health hazards for the employees.
 7. Thanks to the existence of the Civil Defense Formation, necessary first aid may be provided to the affected employees until the time a specialized vehicle of the emergency response team arrives. Furthermore, the Civil Defense Formation in the Group is an important factor supporting the process of planned and organized fire drills in our locations, which take place in close cooperation with the State Fire Brigade and the Police.
 8. All employees must undergo training in the field of occupational health and safety required by the law and carried out on the basis of dedicated training programs. Only the employees in whose case medical examination demonstrated lack of counter-indications to perform their specific jobs are permitted to work.
 9. As regards the job positions which require additional qualifications, it is only the employees who have completed special training (e.g. in the field of safe work at height, safe work in electromagnetic fields, operation forklifts as well as work with electrical voltages of up to 1 kV (SEP, etc.)) that may perform such jobs. Employees are provided with work clothing and personal protective equipment as per valid standards
 10. The Company offers numerous benefits which facilitate access to healthcare and which are intended to offer support in achieving the so-called work-life balance, including:
 - 10.1.healthcare subscriptions,
 - 10.2.membership in a sports and recreation program which enables access to sports facilities nationwide,
 - 10.3.a unique group insurance offer prepared by one of the biggest insurers on Polish market.
 11. All the information and internal regulations related to safe work environment and the possibilities of enjoying the benefits are available in our internal information portal at:
http://onlineinfo/dokumenty/default.asp?id_kategori=115 oraz
<https://gkcp.sharepoint.com/sites/vademecum>.

11. Reporting of suspected cases of violation of human rights

1. Obligated Entities have the duty of immediately reporting all the cases of violation of human rights while observing the principles laid down by the Procedure of Reporting of Cases of Offences and Follow-up Actions.

2. Cases of violation of human rights by the Obligated Entities can be also reported by other entities who are aware of such situations.
3. No reported case of violation of human rights shall be left without being reviewed and without adequate actions being taken, if confirmed.
4. No retaliatory actions or attempts of retaliatory actions, or threat of such actions may be made against a person who reported violation of human rights.
5. The condition for granting protection to the person reporting violation of human rights, in accordance with the Procedure of Reporting Cases of Internal Offences and Follow-up Actions, is for the reporting person to be acting in good faith.
6. If the reporting person acted in bad faith, being aware that the reported information is not true, then such a person will face the responsibility for harm caused by their action, based on the general principles stipulated by the Civil Code.

12. Consequences of non-observance of the provisions of the Anti-Corruption Policy

1. Depending on the circumstances, non-observance of the principles of the Anti-Corruption Policy by the Obligated Entity may result in refusal to sign an agreement or termination of the agreement binding the Obligated Entity with the Company, without the Obligated Entity's right to receive any compensation.
2. Every time when the sanction indicated in item 1 above is applied, the Company will request the Obligated Entity who did not observe the principles of the Policy to provide explanations and to eliminate, from its operations or from the operations of the entities for which the Obligated Entity is responsible, any behavior leading to such a violation.
3. Violation of the principles of the Policy by an employee, especially by a member of the Company's management, may result in disciplinary actions, including termination of the employment contract or the managerial contract with immediate effect, without observing the notice period.
4. By permitting acts of violence, discrimination or unequal treatment, Obligated Entities will be subject to liability based on valid law, especially the Labor Code, the Criminal Code and the Civil Code regulations.
5. The Company will act impartially, reliably and with a common sense when assessing the degree and the nature of violation of the principles of the Policy, while accounting for all the circumstances which influence the assessment of a given situation.
6. Where violation of human rights is confirmed, corrective actions will be taken to reduce the risk of recurrence of such events in the future.

13. Final provisions

1. Observance of the principles of the Policy does not release one from observing the law.
2. The Policy is published on the Company's Internet website: <https://grupapolsatplus.pl/pl/odpowiedzialny-biznes> as well as on the following corporate Intranet websites <https://gkcp.sharepoint.com/> and <http://onlineinfo/dokumenty/>.
3. Compliance Officer for Respect for Human Rights is the party responsible for maintaining the compliance of the Policy with the law and for its publication.
4. The Policy should be subjected to a review process once every two years and it should be updated on the basis of the results of such a review and of the Company's requirements.