

# POLICY AGAINST BULLYING, DISCRIMINATION AND UNEQUAL TREATMENT

## AT IMPACT CLEAN POWER TECHNOLOGY S.A.

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## What is the purpose of the Policy?

Our aim is to create a workplace where every employee - regardless of position, background, gender, age, beliefs, ability or other personal characteristic - feels safe and is treated with respect and trust.

For this reason, we introduce and apply an Anti-Harassment, Discrimination and Unequal Treatment Policy (hereinafter the "**Policy**") to counter undesirable behaviour, but also to promote an organisational culture based on the values of equality, responsibility and mutual respect.

The Policy is a clear message that we do not tolerate bullying or discrimination in any form. Clearly defined rules and procedures help to identify and respond effectively to phenomena that violate the dignity of our team members.

It is also a tool for us to support the building of a positive *employee experience*, increasing engagement and talent retention.

From a business perspective, the Policy has a preventive and strategic role. Anti-harassment and anti-discrimination directly translates into higher team efficiency, lower absenteeism, reduced legal risks and building a reputation as a responsible and modern employer. It is an investment in the stable development of IMPACT CLEAN POWER TECHNOLOGY S.A. as an organisation based on sustainable values.

## Who does the policy apply to?

The policy applies to everyone involved in our organisation - regardless of form of employment, position or place of work.

It covers:

- all employees,
- those working with us under civil law contracts (e.g. contract of mandate, B2B),
- temporary employees,
- apprentices, trainees, volunteers,
- candidates for employment,
- other persons residing in or interacting with our organisation in the context of a professional relationship (e.g. contractors, subcontractors, suppliers).

The policy applies to face-to-face interactions as well as to remote, hybrid or electronic communications - regardless of the channel or form of interaction.

We see a special role in the implementation of the Policy among managers and those in charge of the individual teams of our Company. It is from them that we expect to promote by their own example an appropriate level of

respect and organisational culture, but also to respond to any signals of irregularity from other employees or business partners.

## WHAT IS IT THAT WE OPPOSE?

As an employer, we oppose all manifestations of:

- **Bullying** - by which we mean actions or behaviour towards or against an employee that consists of persistent and prolonged harassment or intimidation, causes an employee to underestimate his or her professional abilities, aims to humiliate or ridicule him or her or leads to his or her isolation or exclusion from the team.
- **Unequal treatment** - i.e. a violation of the principle that employees have equal rights by virtue of performing the same duties equally.
- **Discrimination:**
  - **direct** - which consists of unjustified unequal treatment in a comparable situation, i.e. less favourably than other people. It also includes encouraging or forcing another person to violate the principle of equal treatment;
  - **indirect** - where, as a result of an apparently neutral provision, criterion applied or action taken, there is or could be a disadvantage or particular disadvantage in respect of the establishment and termination of the employment relationship, terms and conditions of employment, promotion and access to training for all or a significant number of employees who belong to a group distinguished on one or more of the above grounds. The exception is when this provision, criterion or action is objectively justified in terms of a legitimate aim and the means used to achieve it are appropriate and necessary.
- **Harassment** - i.e. unwanted conduct that has the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment towards that person.
- **Sexual harassment** - that is, harassment of a sexual nature or relating to the sex of an employee or worker. This may consist in particular of physical, verbal or non-verbal elements.
- **Violations of the personal rights of our team members** - i.e. unlawful behaviour that threatens or violates values such as, for example, good name, privacy, dignity, bodily integrity. We oppose them irrespective of the employment basis of those affected.

## What could be an example of bullying, discrimination or unequal treatment?

To effectively prevent phenomena that violate dignity and equality at work, it is important to understand how they can manifest themselves in everyday work situations. The following are examples of behaviour that, taking into account the whole context of a given situation, may be considered as mobbing, discrimination or harassment.

At the same time, we emphasise that the perpetrator of bullying or harassment can be not only a supervisor, but also:

- a co-worker,
- a person in an equivalent position (so-called *bullying*), or
- a lower position in the structure (so-called *staffing*),
- or even our business partner.

## Bullying - or persistent harassment and intimidation

- Regular criticism in front of others, ridiculing you or making fun of your ideas.
- Deliberately isolating you from the team, ignoring you at meetings, omitting you from email communications.
- Demanding information in a raised voice during a meeting or video conference.
- Disseminating false information about you, questioning your competence, but also unfounded allegations of bullying, discrimination or harassment.
- Exerting psychological pressure, e.g. threats of job loss without any real basis.

## Discrimination - unequal treatment based on personal characteristics

- Being overlooked for promotions, bonuses, interesting projects solely because of, for example, your gender, disability, age or nationality.
- Rejecting you as a job candidate e.g. because of your age, appearance, religion or sexual orientation.
- Assigning responsibilities on the basis of stereotypes (e.g. "women are not suitable for technical tasks", "people of this age cannot master new technologies").
- Using exclusionary or insulting language towards people from minority groups.
- Treating employees of the same experience and competence systematically less favourably - simply because of a personal characteristic.

## Harassment - that is, the violation of dignity through unwanted behaviour.

- Commenting on appearance, dress or personal characteristics in an inappropriate way, including sexualising.
- Telling obscene jokes, displaying erotic content or jokes with sexual overtones.
- Attempts at physical contact without consent (e.g. unwanted hugs, touching of the arm, hand holding).
- Sending messages with suggestive content or sexually *explicit* pictures, graphics.
- Making allusions to 'favours' in return for promotion, bonuses or more favourable treatment.

Situation	Example	Why is it not a violation?
<b>Legitimate demands</b>	A supervisor asks you to correct errors in a report or complete a task urgently.	This is part of management and work organisation.
<b>Single conflict</b>	There is a one-off emotional exchange between employees.	As a rule, bullying must be persistent and long-lasting.
<b>Constructive feedback</b>	The employee receives feedback on areas for improvement.	Substantive criticism is part of professional development.
<b>Personnel and organisational decisions</b>	Change of team or termination for objective reasons.	If they are justified and transparent - they do not violate the law.
<b>Differentiation based on facts</b>	Bonus goes to those with the highest performance.	Equality does not mean uniformity - objective criteria count.

#### Important:

Any of these behaviours - even if on the surface they appear to be joking or casual - can be a violation if they cause the other person discomfort, fear, feelings of humiliation or exclusion

## It is NOT bullying, discrimination or unequal treatment if...

## What action do we take?

We are aware of our legal and ethical obligation to counter bullying, unequal treatment and harassment. To this end:

- We have implemented an Internal Reporting Procedure, which ensures that wrongdoing can be reported safely and confidentially and that each case can be effectively investigated by a team of professionals;
- We document and monitor the progress of the case, informing those involved of the outcome;
- We disseminate the principles of equal and ethical treatment on the intranet, during the implementation process and in HR materials;

- We provide e-learning, checklists and short educational materials on good working practices;
- We conduct anonymous surveys among our team to catch undesirable developments;
- We implement interim measures where necessary (e.g. separation of conflicting parties, change of team);
- We respond to retaliation - we do not allow reprisals against those reporting the problem;
- We conduct reviews of policies and procedures to be in line with current needs and best practice.
- We respond according to a zero-tolerance approach and draw consequences for wrongdoers, which, as appropriate, may include disciplinary action, termination or other reasonable, effective and lawful action.

Any irregularity of the above nature is detrimental not only to the person affected but also to our entire organisation. It will therefore be met with our appropriate response.

In particular, we draw attention to the fact that, depending on who is the perpetrator of the irregularity, it may be considered as a serious breach of fundamental duties of the employee or of any other contract linking the person with us, entailing liability for disciplinary action, damages or even criminal liability.

At the same time, we emphasise that obviously unsubstantiated allegations of bullying, unequal treatment, discrimination or harassment that damage the good name of our organisation or its members may be assessed in the same way.

## What do we expect from our employees and business partners?

Building a working environment free of bullying, discrimination and harassment is a shared responsibility - both of the organisation and of everyone who works with it. Therefore, we expect both our employees and our business partners to support these values not only in declarative terms, but above all in their everyday behaviour.

In particular, we expect them to:

- to familiarise themselves with the content of the Policy and to apply it in practice;
- maintain a culture of expression, also in situations of stress or conflict;
- to be attentive to microaggressions and unconscious biases - and to be prepared to learn and change;
- avoid jokes or comments that might offend someone's beliefs, appearance, gender, orientation, age, background, etc.; and
- refrain from any form of harassment, unequal treatment, discrimination, harassment or other forms of violating the personal rights of our Company's team members;

- report irregularities that we have observed and cooperate in the investigation process;
- support those who find themselves in difficult situations - empathy, support and solidarity make a real difference.

## Why is this important?

Because it is only through shared commitment that we can create a working environment where everyone has equal opportunities, feels safe and can develop their full potential - regardless of whether they are an employee, a leader or an external partner.

## What can you do if you see bullying, unequal treatment, discrimination or harassment in our organisation?

If you see situations that you think may be bullying, unequal treatment, discrimination or harassment - don't be indifferent.

If you feel that someone is directing abusive behaviour towards you - don't be afraid to report it.

As a witness or as someone directly affected, you can report any such incident using our electronic whistleblowing channel at <https://whistleblowersoftware.com/secure/impact>.

You can find detailed information on how to report a breach in our Internal Reporting Procedure.

We will ensure that your report remains confidential, supported and protected from any retaliation for reporting.

If for any reason you do not wish to use this pathway you can also contact the TDJ Compliance Officer of which we are a member at [compliance@tdj.pl](mailto:compliance@tdj.pl).

## Monitoring and changes to the Policy

TDJ's Compliance Officer monitors the currency of the provisions of the Policy on an ongoing basis. The Policy is reviewed and updated periodically - at least once every two years. The Policy is updated more frequently if new risks are identified, if there are changes to generally applicable laws or the Company's internal regulations, or if issues need to be addressed.

In case of doubt, uncertainty or difficulty in interpreting or applying the Policy, the TDJ Compliance Officer must be consulted.