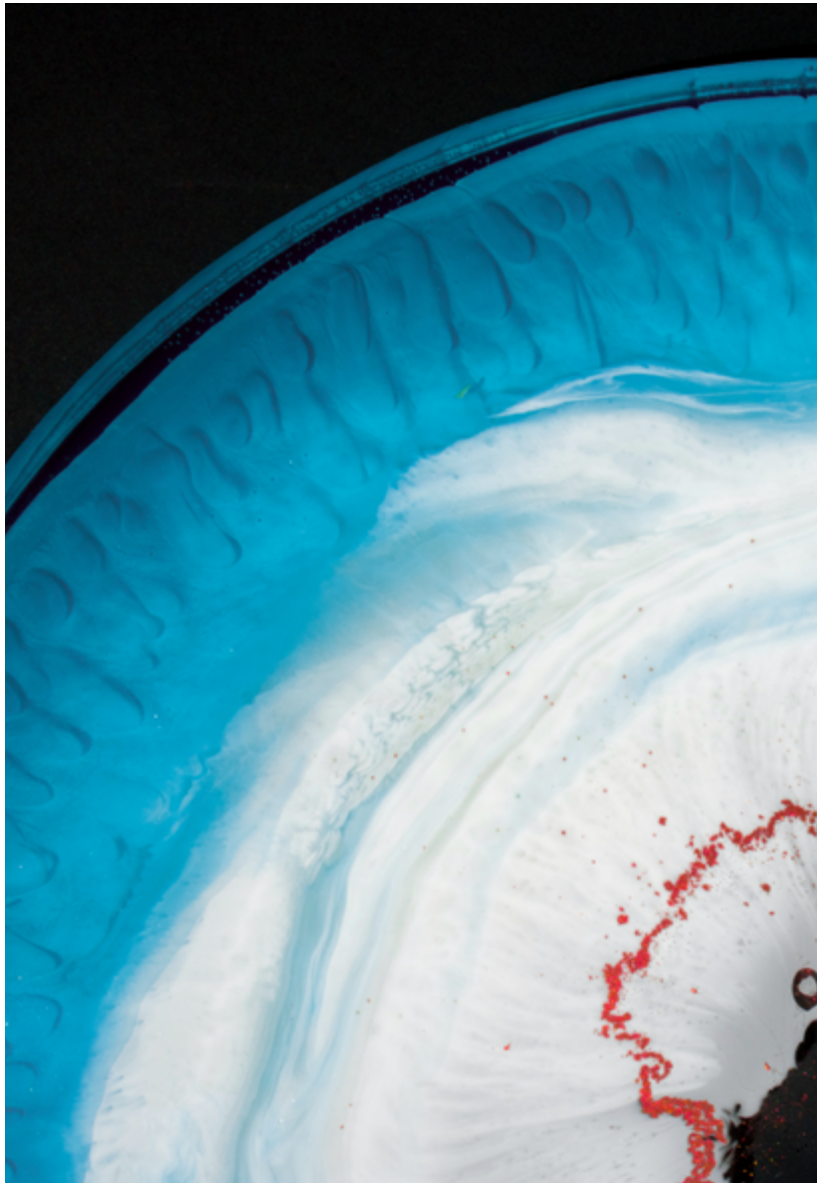




ANTI-MOBGING AND ANTI-DISCRIMINATION POLICY



INTRODUCTORY PROVISIONS

1. This Anti-Mobbing and Anti-Discrimination Policy applies at SARZYNA CHEMICAL SP. Z O.O.
2. The Policy applies to all Employees of the Company, regardless of the type of contract, length of service or position.
3. Whenever used in this document, the terms below have the following meaning:
 - a) **Policy** – means this Policy Anti-Mobbing and Anti-Discrimination Policy;
 - b) **Employer** or the **Company** – means SARZYNA CHEMICAL SP. Z O.O.
 - c) **Employee** – means a person employed by the Employer under an employment contract;
 - d) **Committee** – means a team that may be appointed by the Trusted Person to support an investigation into a report of undesirable conduct;
 - e) **discrimination** – means unequal treatment as regards the establishment and termination of the employment relationship, conditions of employment, promotion and access to training for the development of professional qualifications, in particular as regards sex, age, disability, race, religion, nationality, political opinion, union affiliation, ethnic origin, denomination, sexual orientation, definite or indefinite term of employment or full or part-time employment.
 - f) **harassment** – means undesirable conduct, the purpose or effect of which is an infringement on the dignity of an Employee and creation of an intimidating, hostile, degrading, humiliating or offensive atmosphere towards them;

- g) **sexual harassment** – means any undesirable conduct of a sexual nature or relating to the sex of an Employee, the purpose or effect of which is an infringement on the dignity of an Employee, in particular by creation of an intimidating, hostile, degrading, humiliating or offensive atmosphere towards them; such conduct may consist of physical, verbal or non-verbal aspects;
 - h) **mobbing** – means actions or behaviours concerning an Employee or directed against an Employee, consisting in persistent and long-term bullying or intimidation of the Employee, causing them to underestimate their professional fitness, causing or aimed at humiliating or ridiculing the Employee, isolating them or eliminating them from the team of colleagues;
 - i) **undesirable conduct** – means discrimination, harassment, sexual harassment and mobbing.
4. The priority objective of this Policy is to support activities conducive to building a positive atmosphere in the workplace, including, in particular, good relations between all Employees, and to actively prevent conflicts and other undesirable conduct, including, in particular, to actively prevent mobbing.
5. The Employer takes measures defined in this Policy with a view to maintaining a positive work environment, free from undesirable conduct violating the personal rights of Employees and other persons.

OBLIGATIONS OF EMPLOYEES

6. All Employees are obliged to respect the personal rights of other Employees, visitors, customers and business partners of the Employer.
7. Employees who experience undesirable conduct towards them or who have become aware of any undesirable conduct towards Employees, visitors, customers or business partners of the Employer, are obliged to report this fact to the Employer via the Contact Box or Trusted Persons.

8. Failure to comply with the above obligations will be treated by the Employer as a breach of Employees' duty.

EMPLOYER'S EFFORTS FOR PREVENTION

9. In order to implement the Policy of counteracting undesirable conduct in the workplace, the Employer:
- a) informs Employees of the provisions on equal treatment, being an extract from the Labour Code;
 - b) integrates the subject of counteracting discrimination and mobbing into the OHS training program;
 - c) organizes training for Employees, including Employees managing teams, among others in the field of recognizing and preventing undesirable conduct in the workplace;
 - d) conducts periodic surveys to identify the atmosphere in the team of Employees and, if necessary, takes appropriate measures.

E-CONTACT BOX, TRUSTED PERSONS

10. The Employer establishes an E-Contact Box in the form of an e-mail address (pomoc@sarzynachemical.pl) operated by a Trusted Person or Trusted Persons. Access to the Contact Box is granted to a Trusted Person or Trusted Persons for the duration of this function. Regardless of the creation of the E-Contact Box, complaints may also be reported in writing to a traditional contact box or in person to a Trusted Person.
11. The Management Board of the Company appoints at least one Trusted Person who, in its opinion, has the appropriate qualities and enjoys trust of Employees to perform this function. A Trusted Person performs their function until revocation by the Management Board of the Company or until resignation.

12. The duties of a Trusted Person(s) include the following:
 - a) operation of the E-Contact Box and the traditional contact box;
 - b) receipt of Employees' complaints about undesirable conduct;
 - c) preliminary analysis of complaints and deciding on any appointment of a Committee;
 - d) support for Employees in preventing or resolving conflicts in the organization.
13. A Trusted Person may be any person employed in the Company, regardless of the legal basis, as well as a person from outside the workplace.

REPORTING COMPLAINTS

14. Employees may report complaints about undesirable conduct via the E-Contact Box, traditional contact box or directly to a Trusted Person.
15. A complaint should specify the problem, as well as contain the most accurate description of the situation together with an indication of possible witnesses of the described events, or indicate other evidence.
16. A complaint may be nominative or anonymous.
17. Anonymous reports are registered, and the Employer takes appropriate action taking into account the content of the complaint and the impossibility of asking its author to supplement or clarify the complaint due to its anonymous nature.
18. An Employee who makes a report in good faith will not suffer any negative consequences. In particular, no forms of persecution may be used in relation to such Employee. Violation of this prohibition will be considered by the Employer as a serious breach of the basic Employee duties.

19. If a complaint is received, a Trusted Person performs a preliminary assessment of the complaint and takes appropriate action.
20. At any stage, a Trusted Person may request the Employee who submitted a complaint, to supplement or clarify the complaint.

COMMITTEE

21. In order to investigate the circumstances of a complaint and assess its grounds, a Trusted Person may, if they deem it necessary, appoint a Committee whose task will be to support the Trusted Person in the investigation.
22. The Committee, if appointed, is composed of 3 to 5 persons, including the Trusted Person as the Chairperson of the Committee. The Trusted Person decides on the composition of the Committee. The Trusted Person should take into account the recommendation of the person submitting the complaint in this respect, if any.

A representative of Employees and experts from outside the workplace may also be appointed to the Committee.

23. A member of the Committee may not be a person:
 - a) in relation to whom in the past there have been confirmed allegations of discrimination, harassment, sexual harassment or mobbing;
 - b) to whom the complaint relates;
 - c) being the immediate superior of the person to whom the complaint relates;
 - d) reporting directly to the person to whom the complaint relates.

24. A member of the Committee who believes that any of the above may exist in relation to themselves, which may cast doubts as to their impartiality, independence or objectivity, may exclude themselves from the work of the Committee by submitting a written declaration in this matter.
25. In place of the persons referred to in points 23 and 24 above, the Trusted Person appoints other persons on the ad hoc basis.
26. Members of the Committee perform their duties in good faith, respecting the principles of independence, impartiality and objectivity.
27. Participation in the work of the Committee is voluntary. A member of the Committee may resign from their function at any time. Membership in the Committee also ceases when the obstacles referred to above emerge or the employment relationship is terminated.

INVESTIGATION

28. Unless a complaint is obviously groundless, a Trusted Person (independently or in cooperation with the Committee) conducts an investigation in order to clarify the circumstances of the complaint and assess its grounds.
29. The duties of a Trusted Person include ensuring the efficient handling of a complaint, convening – where necessary – meetings of the Committee, as well as chairing the same.
30. Investigations, including meetings of the Committee, take place at the premises of the Employer. In cases justified by the interest of the person who experienced undesirable conduct towards them or by the efficiency of an investigation, a Trusted Person may order these activities to be performed outside the premises of the Employer.
31. A Trusted Person and members of the Committee, if appointed, participate in the investigation personally. In justified cases and as far as possible, it is allowed to participate in the meetings of the Committee by means of remote communication.

32. Investigations, including meetings of the Committee, if appointed, are closed to the public. A Trusted Person, members of the Committee, the Employee who lodged the complaint or the Employee to whom it relates, as well as persons called by a Trusted Person, may participate in the investigation.
33. The investigation should clarify all relevant circumstances of the complaint. For this purpose, the following actions can be taken in particular:
 - a) summon an Employee to provide oral or written explanations;
 - b) hear witnesses;
 - c) confront the parties;
 - d) gain access to employee records, including Employees' personal files – as long as it is necessary to establish the relevant circumstances of the complaint;
 - e) ask for an expert opinion from outside the workplace;
 - f) gain access to video surveillance recordings – as long as it is necessary to establish the relevant circumstances of the complaint;
 - g) gain access to the selected work e-mail correspondence of an Employee – as long as it is necessary to establish the relevant circumstances of the complaint.
34. The activities undertaken in the course of an investigation are to be described in a report. The report should in particular specify:
 - a) date and place of the meeting;
 - b) attendees;
 - c) course of the meeting
 - d) explanations submitted by the summoned persons;

- e) decisions of the Committee (if any);
- f) information about the results of the voting, if any.

The reports are confidential and available for access by a Trusted Person, members of the Committee, if appointed, and the Management Board of the Company.

35. The investigation takes place during working hours. Persons conducting the investigation and summoned Employees are exempt from the duty to perform work for the time necessary to carry out activities with their participation/attendance. They retain the right to remuneration for the time of release from the duty to perform work.
36. Before the final closure of a complaint, a Trusted Person – if they consider it justified in the interest of the Employee who experienced undesirable conduct towards them – may request the Employer to take appropriate action, including in particular:
- a) temporary transfer of the Employee who experienced undesirable conduct towards them or the alleged perpetrator to another job;
 - b) delegating the Employee affected by undesirable conduct or the perpetrator to other work;
 - c) mediation;
 - d) providing the Employee who experienced undesirable conduct towards them in the workplace with other assistance, including psychological support.
37. After a detailed investigation of all relevant circumstances, a Trusted Person (independently or with the participation of the Committee) proceeds to:
- a) assess the grounds of the complaint under consideration;
 - b) qualify the identified undesirable conduct;

- d) develop recommendations for further action by the Employer.

The above issues are resolved by the Committee (if appointed) by a simple majority of votes understood as the majority of votes “for” over votes “against”. In the event of a tie, the vote of the Chairperson of the Committee decides.

38. After completion of an investigation, a Trusted Person prepares a report, which in particular indicates:
- a) the date the complaint was received;
 - b) the subject matter of the complaint;
 - c) the course of the investigation;
 - d) conclusions and findings made;
 - e) assessment of the grounds of the complaint with justification;
 - f) recommendations for further actions for the Employer.

The report should be made in an anonymized form, without revealing the identity of the complainant or witnesses.

39. If a Committee participated in the investigation, the report is to be signed by all members of the Committee. The refusal to sign the report by any member of the Committee must be marked in the report along with the indication of a dissenting opinion. Each member of the Committee may submit a dissenting opinion as to the findings of the Committee. The member who has submitted a dissenting opinion must justify it in writing, which is to be attached to the report.
40. The report is submitted to the Management Board of the Company immediately after preparation.

41. The complainant Employee and the Employee whose conduct was indicated in the complaint are provided with information containing key findings and the resolution of the investigation. The information provided to the above persons should be anonymized, without revealing the identity of the complainant or witnesses.

GUARANTEES FOR MEMBERS OF A COMMITTEE

42. A member of a Committee may not suffer any negative consequences of acting in good faith within the Committee. In particular, no forms of persecution may be used in relation to a member of a Committee. Violation of this prohibition constitutes a serious breach of the basic Employee duties.

CONFIDENTIALITY

43. Before starting their work, members of a Committee undergo training in the field of personal data protection, as documented by their written statement.
44. Members of a Committee are obliged to keep confidential all information they have obtained in connection with the work of the Committee.

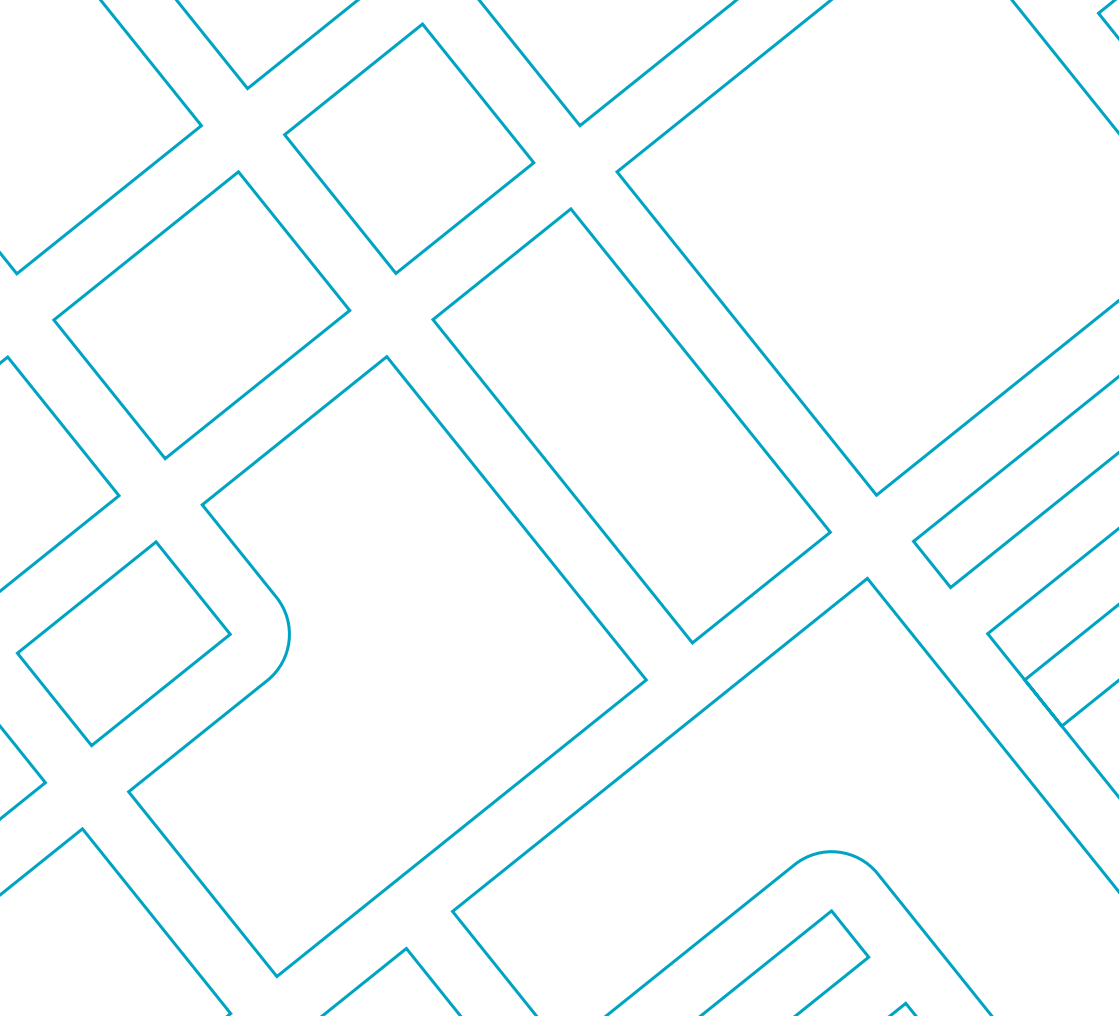
FINAL PROVISIONS

45. The Policy enters into force on the day of its adoption by the Management Board of the Company.
46. The provisions of this Policy should be interpreted and applied in a manner consistent with applicable law, including in particular in accordance with the provisions on the protection of personal data and labour law. A change in a legal provision causing any provision of this Policy to become inconsistent with the applicable legal status will have the effect that a provision inconsistent with the applicable legal status should be interpreted in such a way that, as far as possible, the essence and purpose of a provision are

preserved to the highest extent permitted by law. Regardless of the above, the Employer, as far as possible, will amend the content of the Policy accordingly to match the applicable legal status.

47. The content of the Policy is made available to all Employees by posting it on the Intranet and by making it available for inspection in the Human Resources Department.
48. A Trusted Person will receive relevant details necessary to operate the E-Contact Box.
49. Newly hired Employees are familiarized with the content of the Policy along with other regulations in force at the Employer, as proof of which an Employee submits a written statement that is attached to the Employee's personal files.
50. The Management Board of the Company holds a review of the operation of this Policy once a year and, if necessary, makes the necessary amendments.





SARZYNA CHEMICAL
2021