



## Human Rights Policy in the GPW Group

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## 1. Introduction and purpose of the document

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1.1. This Human Rights Policy ("Policy") sets out the principles followed by the Warsaw Stock Exchange Group (GPW Group) with regard to respecting, protecting and promoting human rights. The document provides a framework for actions undertaken by the GPW Group to ensure compliance with national and international standards as well as internal company procedures.

## 2. Scope of application

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2.1. The Policy applies to all employees of the GPW Group, regardless of their position, and also applies to contractors, suppliers, business partners and other stakeholders. The GPW Group expects its stakeholders to respect the same principles and values. Particular attention is paid to the protection of vulnerable groups such as children, persons with disabilities, migrants and minorities.

2.2. This Policy reflects our commitment to respecting human rights throughout the value chain, avoiding infringements of those rights, preventing and mitigating adverse impacts where such infringements occur, and undertaking remedial.

2.3. This Policy is complemented by other documents applicable within GPW, in particular: the Code of Ethics, the Policy towards suppliers and the supply chain regarding respect for human rights, ethical and environmental issues in the GPW Group, the Procedure for reporting violations and protection of whistleblowers, the Anti-Mobbing Policy and the Anti-Corruption and Fraud Prevention Policy in GPW, while in other companies of the GPW Group, the relevant documents applicable in a given company ensure compliance with the principles set out in this Policy.

## 3. International frameworks and standards

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The GPW Group undertakes actions aimed at implementing this Policy in accordance with the principles contained in:

- 3.1. the United Nations Guiding Principles on Business and Human Rights;
- 3.2. the OECD Guidelines for Multinational;
- 3.3. the principles and rights set out in the eight fundamental conventions referred to in the International Labour Organization Declaration on Fundamental Principles and Rights at;
- 3.4. the principles and rights set out in the International Bill of Human.

## 4. Principles of conduct

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The GPW Group is committed to respecting and promoting the following principles in the area of human rights:

- 4.1. Ensures equal opportunities within the organization and prevents all forms of discrimination based on gender, racial or ethnic origin, nationality, religion or belief, disability, age, sexual orientation or other relevant forms of discrimination concerning internal or external stakeholders conducting business activities. This also applies to harassment as a specific form of discrimination. This commitment also applies to recruitment, promotion and remuneration processes within the GPW Group structure.
- 4.2. Creates a safe, inclusive and accessible work environment, promoting respect, cooperation and diversity in the.
- 4.3. Provides decent and safe working conditions in compliance with occupational health and safety regulations and supports work-life.
- 4.4. Protects the privacy and personal data of employees, contractors, suppliers, business partners and other stakeholders, processing such data in accordance with applicable laws and with respect for the right to privacy.
- 4.5. Protects whistleblowers and provides secure and confidential channels for reporting violations in accordance with the applicable internal procedure.
- 4.6. Conducts fair and transparent HR processes, ensuring equal treatment at every stage of employment.
- 4.7. Ensures fair and ethical recruitment practices, especially with regard to groups at risk of exclusion.
- 4.8. Respects employees' rights to freedom of association and social dialogue.
- 4.9. Establishes and applies transparent, objective and gender-neutral criteria for determining remuneration, bonuses and promotions.
- 4.10. Promotes among suppliers and contractors the values and principles set out in the "Policy towards suppliers and the supply chain regarding respect for human rights, ethical and environmental issues in the GPW Group".
- 4.11. Provides employees with access to an educational platform offering training, including in the areas of human rights, ethics and diversity.
- 4.12. Takes into account the prevention of the use of GPW Group activities for purposes violating human rights, including money laundering, corruption, human trafficking, financial fraud or other economic crimes related to human rights violations.
- 4.13. Does not tolerate any form of violence, mobbing, discrimination, including harassment as a specific form of discrimination, or other conduct violating human dignity. The GPW Group applies a zero-tolerance principle towards the above-mentioned undesirable behaviours.
- 4.14. In relations with market participants, the GPW Group promotes respect for human rights, ethical standards of conduct and equal access to services, products and information within the scope of its activities. It supports awareness-raising and social responsibility through educational, regulatory and informational activities.

## 5. Reporting violations and protection of reporting persons and case management

- 5.1. The GPW Group provides secure channels for reporting violations related to respect for human rights ("Violations").
- 5.2. At GPW, Violations may be reported and managed in accordance with the principles set out in the Procedure for reporting violations and protection of whistleblowers.
- 5.3. Following an internal investigation, the GPW Compliance Officer presents conclusions to the Management Board of the Exchange and may also submit recommendations regarding further proceedings and management of the violation, including in cases where a human rights violation is identified.
- 5.4. Based on the report, documentation and recommendations received from the Compliance Officer, the Management Board of the Exchange decides on the further course of action.

## 6. Consistency with the Code of Ethics

- 6.1. This Policy supplements the provisions contained in the GPW Code of Ethics regarding ethical conduct, protection of human rights and prevention of discrimination and mobbing. The Policy remains fully aligned with the values governed by the Code. In particular, the role of the Ethics Ombudsman as the person responsible for supporting compliance with ethical principles and promoting human rights protection standards is emphasized.

## 7. Monitoring, review and final provisions

- 7.1. Activities resulting from this Policy will be monitored and, where necessary, updated taking into account organizational, legal or operational changes. The Policy itself is subject to periodic review in accordance with the Rules for creating, implementing and updating internal regulations at the Warsaw Stock Exchange S.A.
- 7.2. GPW or, respectively, companies within the GPW Group monitor the implementation of this Policy through:
  - a) analysis of reports received through secure violation reporting channels referred to in section 5;
  - b) where necessary, verification of selected contractors or areas of activity where there is an increased risk of human rights violations.
- 7.3. At least once a year, GPW or the relevant companies within the GPW Group review the Policy and update it if necessary.
- 7.4. In the event of a serious breach of the principles set out in section 4, GPW or the relevant companies within the GPW Group shall immediately undertake remedial actions and, if necessary, update this Policy.
- 7.5. Other companies within the GPW Group, as part of the approval of this Policy, adapt its provisions to the internal regulations applicable in a given company.

7.6. The Policy enters into force on the date of its approval by the GPW Management Board.