



DIVERSITY, EQUITY AND INCLUSION POLICY

OF THE POLENERGIA GROUP



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1. Foreword

Since its inception, the Polenergia Group has been building and developing its business in a sustainable manner. For us, this means responsibility – for the environment, for the local communities among which we operate every day, for future generations, but also for our key stakeholders – the people who work at the Polenergia Group.

Therefore, I would like to emphasise that we regard the Diversity, Equity and Inclusion Policy as an embodiment of our values. I firmly believe that our business will only grow if we create a workplace where everyone can feel safe, where their presence is recognised and their voice heard, and where they can realise their full potential and have an actual impact on the organisation's culture.

Respectful treatment of all of our stakeholders, combined with transparent and honest communication, are the backbone of our daily business practice. Thus, the provisions of the Policy are not so much a declaration as they are an ongoing commitment towards our employees, collaborators, local communities, customers, business and social partners, beneficiaries, service providers and the media. The Policy serves as a guide for our daily decisions made as individuals and teams.

The Diversity, Equity and Inclusion Policy has been promulgated with the aim of strengthening our organisational culture – further developing the space where diverse perspectives and experiences are cultivated and appreciated; creating a workplace that brings us together.

I would like to thank everyone who has been personally involved in the preparation of this Policy and all the staff members who have commented on it and/or submitted their suggestions. Thanks to your contribution I am confident that this document will address your needs, while also urging us all to actively work towards building an organisation that is equitable and open to diversity.

Understanding the importance of the Diversity, Equity and Inclusion Policy for the Polenergia Group, I declare that the Management Board will be fully supportive of and cooperative in the implementation of this Policy and will provide the necessary resources in this regard.

Jerzy Zań, President of the Management Board

2. Key assumption

A diverse team is a value that makes up the assets of the Polenergia Group. It is an integral part of both our employment policy and the way we do business. We are committed to creating a workplace that promotes diversity, fosters equal opportunities and a sense of belonging, and protects the human rights of all staff members.

We recognise diversity, equal treatment and an inclusive organisational culture as one of the areas of strategic business importance, as reflected in the Polenergia Group's Strategy and in our ethical values, which include: respect of and support for human rights and labour standards; respect and openness; protection of the environment, plus dialogue and cooperation with local communities; integrity; responsibility and commitment.

We see diversity as an acknowledgement that every human being is unique. Our company is willing to work with employees regardless of their sex, age, education, background, race, psychosexual orientation, gender identity, level of physical fitness, cognitive styles, religion or irreligiousness, family status, marital status, personality traits, lifestyle, form, scope and basis of employment or other characteristics. We believe that, through this approach, we enrich the workplace with numerous experiences, competences and perspectives, that can be shared with others. At the same time, we are convinced that the freedom to express oneself ends where the other person's freedom begins.

We are aware that in our society and in the organisation there exist inequalities and systemic barriers that limit the opportunities for many people. That is why we are determined to take active steps to identify barriers and create a level playing field in the workplace. We are committed to treating everyone fairly. We do not tolerate any workplace bullying or discriminatory behaviour.

For us, creating an inclusive culture means building an organisation where every employee can be true to themselves, where they are heard and respected, are able to realise their full potential, bring value to the organisation and have a sense of psychological safety and where they are able to satisfy their need for good relationships with colleagues.

We firmly believe that the success of our organisation and our society depends on our ability to tap into the power of diversity – thanks to a multitude of experiences and perspectives, our teams are more creative, better suited to cope with changes and more efficient. However, the strongest driver behind our efforts to build an equitable and inclusive workplace is our conviction that this approach is right – it is an expression of respect for fundamental human rights

3. Policy objectives

The objective of the Polenergia Group's Diversity, Equity and Inclusion Policy is to:

- create – through a dialogue with employees – implement and communicate a **consistent approach** to diversity and equity issues within the Polenergia Group,
- **apply all relevant industry requirements**, laws and regulations,
- identify the organisation's **key development paths** in the field of diversity management,
- **implement and ensure the smooth functioning of processes** and organisational structures used for carrying out, evaluating and monitoring the effectiveness of diversity, equity and inclusion activities, including a **safe and effective whistleblowing mechanism**,
- **define commitments** which – in line with the UN Guiding Principles on Business and Human Rights – are meant to protect, celebrate and remedy diversity and respect for the principle of equality, counteract the adverse impact of our business on such issues and minimise the risks involved,
- ensure **transparent and publicly accessible communication** regarding the Group's commitments to create, and its impact on the creation of, an organisation that is open to diversity, nurtures equal opportunities and develops a sense of belonging for the people associated with it,
- **promote diversity, equal opportunities and inclusion** among our stakeholders, both internal and external. zewnętrznych.

4. Application

The Policy is addressed to all persons working at the Polenergia Group – regardless of their seniority, position held or legal basis of employment. Every such person is required to adhere to the provisions of the Policy and cultivate a diverse and equitable work environment that is free from discrimination and workplace bullying.

This Policy also applies to persons holding managerial positions and those performing functions in management and supervisory bodies. They are the ones who have a special role in shaping an inclusive culture based on empathy and respect.

The document is also applied externally, i.e. to external stakeholders, such as, among others, business and social partners, subcontractors, customers, suppliers and beneficiaries, at every stage of our operations.

5. Obligations

5.1. COMMITMENTS TOWARDS PERSONS WORKING AT THE POLENERGIA GROUP

Our major commitment is to create a work environment in which the needs of all employees are addressed, so that they can feel accomplished at a personal and professional level. In the Polenergia Group, we focus on supporting diversity, equity and inclusion through:

- **PROMOTION OF COOPERATION AND MUTUAL RESPECT** -> We make every effort to strengthen good rapport, mutual understanding and willingness to cooperate between employees. We promote the sharing of information and knowledge, honest communication and appreciation of others' work. We provide feedback in a constructive way that allows us to address challenges, while not offending team members.
- **LAWFULNESS AND STANDARD-SETTING** -> Compliance with all regulations on diversity, equity and inclusion, as well as market recommendations. Accordingly, we strive for diversity in the Group's management and supervisory bodies, ensuring that the bodies comprise a legally required representation of people with a certain set of competences, experiences and perspectives. We are committed to preparing a job evaluation process and a salary benchmark to identify salary gaps and associated reduction targets, and to make information on career paths and salaries available to employees.
- **BUILDING INVOLVEMENT AND AWARENESS** -> Developing equality-related knowledge and competences of all staff, with a particular focus on leaders. We carry out educational activities, training and development processes on anti-discrimination, promotion of equality and diversity at work, and deliver a respective onboarding module for new employees. We encourage eager individuals to submit their own pro-diversity initiatives.
- **DIALOGUE** -> By adhering to the "nothing about us without us" principle, we give our employees a voice, actively listen to them, analyse their opinions and needs (e.g. in the annual employee survey, which includes a diversity-specific section) and try to incorporate them when designing solutions and planning activities. We measure the sense of satisfaction and belonging to the organisation, as well as the degree of involvement in diversity and equality efforts.
- **STUDY** -> We regularly study and monitor data related to diversity (demographics vs. employment structure), equality (in access to opportunities and resources offered by the organisation) and inclusion. We use the data to define specific objectives, implement actions, measure the results and evaluate the effectiveness, and to communicate the results to stakeholders.
- **ENSURING EQUAL OPPORTUNITIES AT A SYSTEMIC LEVEL** -> We aim to identify and address inequalities in procedures, policies and working methods that may affect selected employee groups in processes such as: recruitment, internships and placements, employment (including the offered model of work), onboarding, appraisal, promotion, access to training and benefits, and remuneration. We seek to ensure that these processes are organised in a way that guarantees equal treatment at all levels of the Group's structure. When identifying inequalities and barriers, the Group will, among

other things, monitor wage issues using the Gender Pay Gap Ratio, the Glass Ceiling Ratio and taking into account the Fair Wage criteria, and will commit to reducing these ratios.

- **SUPPORT FOR VARIOUS GROUPS' NEEDS** -> Outreach activities for a variety of employee groups, in particular those that may experience inequality in our organisation or that are underrepresented (mainly as regards decision-making). These measures involve, among others, gender equality or increasing the employment of people from minority groups. They also entail adapting the workplace to different needs and ensuring accessibility.
- **SUPPORT FOR EMPLOYEE WELL-BEING** -> For the sake of our employees' health, we use solutions that support the reconciliation of work and private life, we take care of working conditions (ergonomic and friendly workplace) and offer psychological support. We examine the level of stress in employees and implement support measures.
- **PARTNERSHIPS** -> We establish partnerships with NGOs and experts specialising in diversity and inclusion. Through the partnerships, our employees gain insight (e.g. into women's leadership in business, inclusive language, paternity leave, mental health, etc.) from a proven source, while we are able to support the NGOs' work towards social inclusion. A description of the initiatives implemented and the partnerships undertaken can be found in the sustainability report.
- **RESPONSE TO VIOLATIONS** -> We systematically monitor cases of misbehaviour in the organisation. We implement an effective system for reporting and responding to any misbehaviour related to discrimination, exclusion, micro-inequities and workplace bullying.

5.2. COMMITMENTS TOWARDS EXTERNAL STAKEHOLDERS

We incorporate the principle of diversity and inclusion into all of our activities towards external stakeholders, including local communities, customers and business partners. We pursue our approach through:

- **RESPECT AND COOPERATION** -> openness and understanding of the diverse needs, expectations and concerns of the people we work with. We are sensitive to the local, cultural, linguistic and geographical context of the communities in which we operate; we respect the laws and customs of local communities.
- **SUSTAINED DIALOGUE** -> taking action to both better understand our impact on local communities and to learn about the needs of specific groups. We are open to dialogue and try to build strong, benevolent and honest relationships with our stakeholders every day. We formulate our communication in a non-discriminatory manner, while accommodating a diverse environment and taking full responsibility towards the recipients. We also offer our stakeholders various channels for contacting us, including an option to submit requests or complaints that relate to the Polenergia Group's projects.
- **RESEARCH** -> identification of cases of social exclusion among local communities and taking appropriate preventive action.
- **INITIATIVE** -> initiatives and proposals to support local communities in each municipality where Polenergia's projects are located or planned.
- **FINANCIAL SUPPORT** -> we engage in activities aimed at counteracting social exclusion, creating equal opportunities and improving the well-being of local communities and other

beneficiaries. One of the four goals set out in the Polenergia Group's Social Involvement Policy is diversity and the creation of equal opportunities. The local communities identified by the Group as key reside mainly in small rural centres located in the immediate vicinity of the Group's projects. They primarily include: children and young people, people aged 55+, people with disabilities, women from rural backgrounds and neurodiverse people.

6. Management structure

- Działania The activities related to the approval of the Policy and the supervision of its implementation are the responsibility of the Management Board member in charge of HR.
- Operational issues relating to planning, deployment, implementation and monitoring are within the remit of the Diversity Committee.
- The Diversity Committee's activities are directly supervised by the HR Director.
- The Diversity Committee meets on a quarterly basis to review the objectives and monitor the ongoing activities.

7. Division of roles and responsibilities

7.1. Role of the Management

as regards the implementation of the Diversity, Equity and Inclusion Policy:

- review and approval of the Polenergia Group's Strategy which, among other things, addresses issues related to diversity, equity and inclusion,
- review and approval of annual strategic and operational plans setting out diversity management objectives and quarterly verification of the plan against its actual implementation,
- supervision of the implementation of the Policy – analysing reports on monitoring the effectiveness of the measures taken,
- analysis of significant risks associated with managing the impact on the Polenergia Group's staff and other stakeholders and determination of the management's response to the risks,
- providing a qualified team to implement this Policy,
- providing a budget for achieving the Policy objectives.

7.2. The tasks of the Diversity Committee

include:

- establishment of action plans, based on the commitments and objectives set out in the Policy,
- estimation of a budget necessary to achieve the Policy objectives,
- review of the Group's existing procedures, policies and tools, so that they support the Diversity, Equity and Inclusion Policy,
- organisation of training and educational and promotional events to increase the knowledge and competences related to diversity, equity and inclusion and their actual impact on the functioning of teams and the organisation as a whole,
- dialogue with stakeholders (i.e. employees and local communities) and involving them in the joint setting of equity and inclusion objectives,
- sharing guidance and recommendations when developing new solutions, tools or services, so that they support the Policy objectives,
- regular monitoring and evaluation of the Group's efforts to build an inclusive workplace,
- reporting the results of the Policy implementation in the Group's non-financial report.

7.3. Role of team managers (executives at each level) in the implementation of the Policy provisions:

- enhancement of their knowledge and competences related to managing a diverse team, including discovery and overcoming of their unconscious biases (especially in decision-making processes),
- seeking to understand and address systemic barriers faced by people from underrepresented groups,
- supporting members of their teams in developing awareness and gaining the knowledge and competencies (including intercultural competences) required to build an inclusive and equitable work environment though achieving the relevant goals,
- being an example (a role model) of a leader who actively works to counteract discrimination and workplace bullying, responds to misbehaviour (including micro-inequities) within the team and promotes attitudes of respect, cooperation, empathy and equality among his/her collaborators.

7.4. Each person from the organisation is responsible for:

- keeping the work environment discrimination-free,
- promotion and development (e.g. as an ally) of a safe and inclusive workplace, in which all individuals are treated with respect and dignity,
- development of his/her own competences related to diversity, equity and inclusion (including intercultural competences), so as to be able to work effectively with people of different identities,

- response in situations where he/she becomes aware of or witnesses discriminatory misbehaviour or other conduct in violation of the Policy.

8. Monitoring and reporting of activities

- The Polenergia Group regularly monitors and reports on the implementation status of the Diversity, Equity and Inclusion Policy, which is regularly evaluated and improved.
- In conjunction with the commitments set out in the Policy, ambitious and measurable targets are set to build a workplace that is more equitable and open to diversity.
- The Policy and the actions taken on its basis will be reviewed quarterly and updated periodically, at least annually.
- The monitoring of the actions is the responsibility of the Diversity Committee, which reports to the Management Board.
- The results of the Policy implementation will be described in the Group's non-financial report.

9. Reporting of questions and irregularities

- We make every effort to ensure that everyone working at the Polenergia Group is respected and feels safe. We create a culture of openness, collaboration and respect for dignity. We do not tolerate misbehaviour such as workplace bullying, harassment or discrimination. We are committed to actively investigating all cases of irregularities and misbehaviour reported as part of the whistleblowing procedure, and we conduct the procedure with a sense of understanding of the sensitivity of the reported issues and ensuring the protection and confidentiality of the whistleblower.
- Anyone who has concerns about the compliance of certain behaviour with the Diversity, Equity and Inclusion Policy or has witnessed or experienced misbehaviour (especially of a discriminatory nature) is encouraged to report this through the internal whistleblowing channels.
- To this end, he/she should immediately report the irregularities through the channels described in the Whistleblowing Procedure.
- Reports can be submitted both under one's name or anonymously. Anyone reporting a violation is guaranteed identity protection, security and confidentiality of their report.
- The receipt of reports is the responsibility of the Compliance Officer.

- If a report concerns any of the persons involved in the report handling process, the report is automatically forwarded to be handled by an objective and independent person.
- All confirmed violations will be subject to the sanctions provided for under Polish law.
- The Compliance Officer reports periodically on the status of the whistleblowing system in the annual report on the functioning of the compliance system in the Polenergia Group, in accordance with the applicable internal regulations.
- Employees are also encouraged to communicate their concerns and needs during face-to-face conversations with their supervisor, as well as through a satisfaction survey.

10. Related documents

In developing the Policy, we relied on international standards and good practice, including: the Universal Declaration of Human Rights, the UN Sustainable Development Goals, EU legislation and Polish law, the 10 Principles of the UN Global Compact, International Labour Organisation Conventions and the principles of the Diversity Charter, of which we are a signatory. This Policy is part of the human rights due diligence process as defined by the UN Guiding Principles on Business and Human Rights.

The implementation of our Diversity, Equity and Inclusion Policy is supported by internal codes and procedures, such as: the Polenergia Group Code of Ethics, Bylaws of the Ethics Committee, the Whistleblowing Procedure, the Environmental and Social Policy, the Polenergia Group Social Involvement Policy, the Complaint and Request Procedure, the Polenergia Group's Strategy for 2023-2030, as well as the Work Regulations, the Remuneration Regulations, the Employee Training and Qualification Procedure and the New Hire Procedure.

11. Definitions

- **Discrimination** - a situation in which a person – because of his/her characteristic (e.g. gender, age, nationality, disability, psychosexual orientation) or group affiliation – is treated worse/less favourably than another person in a comparable situation.

Glass Ceiling Ratio – an indicator representing the equality of promotion opportunities for each gender in an organisation, calculated separately for individual levels of the organisational hierarchy.

Gender Pay Gap Ratio – an indicator calculated as the absolute value of the difference between the ratio of the average salary of one gender to the other gender and a value of 100%.

- **Polenergia Group, or the Group** – the parent company Polenergia S.A. together with its consolidated subsidiaries.
- **Stakeholders** – persons or entities that may influence the Polenergia Group or that are influenced by the Group's activities; **Internal stakeholders** – persons providing work at the Polenergia Group, regardless of the type of contract under which they are hired; **external stakeholders** – shareholders, customers, suppliers, business and social partners, local communities, the media.

- **Micro-inequities** – minor, subtle, often unconscious and unintentional, deprecatory verbal and non-verbal behaviour (such as e.g. jokes based on stereotypes, disrespectful tone of voice, ignoring of other, etc.) that lead to exclusion and are targeted at people who are distinguished only by a visible feature of identity/group affiliation.
- **Workplace bullying** – actions or behaviour concerning an employee or directed against him/her, consisting in persistent and prolonged harassment or intimidation, leading to a lowered sense of one's professional suitability, causing or intended to cause humiliation or ridiculing of a person, his/her isolation or elimination from a team of co-workers.
- **Harassment** - unwanted conduct, the purpose or effect of which is the violation of a person's dignity or human rights, and the creation of an intimidating, hostile, degrading, offensive or humiliating environment. Such behaviour need not be of a sexual nature.
- **Sexual harassment** – any unacceptable conduct of a sexual nature or relating to an employee's sex, the purpose or effect of which is the violation of a person's dignity or human rights and the creation of an intimidating, hostile, degrading, offensive or humiliating environment. This form of discrimination includes various remarks, jokes, gestures with sexual overtones, up to and including rape.
- **Diversity, Equity and Inclusion Policy** – this document, called the "Policy".
- **Equity, equal opportunities** – denotes both fair treatment and ensuring equal access to opportunities, information and resources, while seeking to identify and eliminate biases and barriers that may exclude underrepresented individuals in the company.
- **Diversity** - any aspects of identity that make us similar or different. They include both invisible and visible qualities; those that are innate or inalienable and those that we acquire in the course of life and that can be shaped by us. These features extend beyond gender, age, level of physical fitness or psychosexual orientation. They also include neuro(a)typicality, family status, seniority or job position.
- **Inclusion** – creating a work environment which instils a sense of belonging in employees and collaborators.

12. Final provisions

This Policy is applied by the entities forming the Polenergia Group.

The Policy is publicly available on the company's website www.polenergia.pl www.esg.polenergia.pl and on the intranet.

Its implementation is supported by communication and/or educational activities carried out within the Group and among external stakeholders. This document is also made known to new employees as part of their onboarding.

If the Policy is updated, the information on material changes to the Policy is communicated to employees within 7 days of making the updated version of the Policy available on the intranet.

Date of adoption of the Policy by the Management Board: **30.10.2024**

Last updated on: **30.10.2024**