





**PROCEDURE  
OF HOW TO PROCEED WITH REPORTS CONCERNING  
MOBBING, DISCRIMINATION, AND OTHER  
UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE  
RELATIONS IN THE POLENERGIA GROUP**



 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>


Document history	
Type of regulation:	Procedure
Approved by:	Polenergia Group
Regulation owner:	Compliance Department
Author of the regulation:	Izabela Kozłowska
Version:	1.0
Date of adoption:	08.04.2025
Dates of change:	
Regulation description:	The Procedure sets out the rules for receiving and reviewing the reports concerning mobbing, discrimination, and other behavior(s) undesirable in the area of employee relations.
Scope of Report:	Polenergia Group
Frequency of review:	At least once a year
Description of changes:	
Confidentiality	Publicly available
List of appendices:	Appendix No. 1: Definitions and description of individual types of Undesirable Behavior(s)  Appendix No. 2: GDPR mandate  Appendix No. 3: Template of information obligations  Appendix No. 4: Confidentiality statement

Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>		08.04.2025		

 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>

## PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP


Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>		08.04.2025		

 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>

## TABLE OF CONTENTS

<b>I.</b>	<b>PREAMBLE .....</b>	<b>5</b>
<b>II.</b>	<b>DEFINITIONS OF UNDESIRABLE BEHAVIOR(S) .....</b>	<b>6</b>
<b>III.</b>	<b>EMPLOYER'S RIGHTS AND OBLIGATIONS .....</b>	<b>7</b>
<b>IV.</b>	<b>EMPLOYEES' RIGHTS AND OBLIGATIONS.....</b>	<b>7</b>
<b>V.</b>	<b>PROCEDURE FOR REPORTING UNDESIRABLE BEHAVIOR .....</b>	<b>9</b>
	Oral Reports .....	10
	Reports via the online platform.....	11
	Written Reports.....	11
	Minimum content of the Report.....	12
<b>VI.</b>	<b>PROCESSING OF REPORTS .....</b>	<b>13</b>
	Initial verification of the Report.....	13
	Establishment and operation of the Commission.....	14
	Conduct of the explanatory proceeding .....	16
	Intervention and support activities .....	17
	Explanatory proceeding report .....	18
<b>VII.</b>	<b>LIABILITY FOR MOBBING AND DISCRIMINATION .....</b>	<b>18</b>
<b>VIII.</b>	<b>CONFIDENTIALITY .....</b>	<b>20</b>
<b>IX.</b>	<b>PROTECTION OF PERSONAL DATA .....</b>	<b>20</b>
<b>X.</b>	<b>REGISTER OF PROCEEDINGS CONDUCTED BY THE COMMISSION .....</b>	<b>21</b>
<b>XI.</b>	<b>PREVENTION ACTIVITIES .....</b>	<b>22</b>
<b>XII.</b>	<b>FINAL PROVISIONS .....</b>	<b>23</b>
<b>XIII.</b>	<b>LIST OF APPENDICES.....</b>	<b>23</b>
	APPENDIX NO. 1: DEFINITIONS AND DESCRIPTION OF TYPES OF UNDESIRABLE BEHAVIOR(S).....	24
	APPENDIX NO. 2: TEMPLATE OF AN AUTHORIZATION TO PERSONAL DATA PROCESSING .....	33
	APPENDIX NO. 3: TEMPLATE OF INFORMATION OBLIGATIONS .....	35
	APPENDIX NO. 4: TEMPLATE OF CONFIDENTIALITY STATEMENT .....	39

Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>		08.04.2025		

 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>

## I. PREAMBLE

### § 1

In fulfillment of the obligations under the Act of June 26, 1976 – the Labor Code (hereinafter: **Labor Code**), relating to the necessity to counteract mobbing, discrimination, and other Undesirable Behavior(s) in the field of HR in the workplace (including from art. 94<sup>3</sup> § 1, art. 18<sup>3a</sup>, art. 94 (2b) in connection with art. 11<sup>1</sup> and art. 94 (10) of the Labor Code), as well as guided by the welfare of employees and the necessity to protect them from Behavior(s) that may negatively affect their sense of security and psychological comfort, the Polenergia Group (hereinafter referred to as **the Group** or **the Employer**) introduces this Procedure on how to proceed with reports concerning mobbing, discrimination, and other Undesirable Behavior(s) in the area of employee relations at the Polenergia Group (hereinafter referred to as the **Procedure**).


### § 2

- By introducing the Procedure, the Group is guided by the need to build an organization based on values reflecting European standards and the desire to foster the right attitudes aimed at ensuring work in a healthy environment, resolving conflicts before they escalate, and being free of psychological and physical violence.
- The Group's breach reporting and prevention system is based on 3 complementary pillars:
  - Pillar I** covering receiving and reviewing reports of violations of the law, referred to in the Act of June 14, 2024, on the protection of Reporting persons, (Polenergia S.A. and Polenergia Fotowoltaika S.A.).
  - Pillar II** covering receiving and reviewing reports in the area of mobbing, discrimination, and other Undesirable Behavior(s) in the area of employee relations.
  - Pillar III** covering receiving and reviewing reports on irregularities other than those indicated in **Pillar I** and **Pillar II**.
- The reporting and prevention system in place is designed to counteract any irregularities that may threaten the interests of the Company, the interests of its employees, or endanger the public good, as well as to detect irregularities at an early stage and eliminate them effectively.

### § 3

- The provisions of the Procedure apply to all employees of the Group, irrespective of their position and type of work, as well as the type of employment agreement and the employee's working hours (hereinafter: **Employees**).

Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>		08.04.2025		

 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>

2. The Procedure applies to all Employees in all work-related situations, including during:

- a) corporate events,
- b) business trips,
- c) training,
- d) in all other situations relating to the performance of tasks for the Employer.

## **II. DEFINITIONS OF UNDESIRABLE BEHAVIOR(S)**

### **§ 4**


1. Undesirable Behavior(s) within the meaning of the Procedure is:

- a) Mobbing,
- b) Unequal treatment in terms of remuneration,
- c) Discrimination,
- d) Harassment,
- e) Sexual harassment,
- f) Emotional abuse,
- g) Encouraging others to violate the principle of equal treatment or ordering unequal treatment,
- h) Use of retaliation for reporting incidents of Undesirable Behavior(s) to the Company,
- i) Escalating or tolerating conflict situations that violate the rules of social coexistence and actions that violate the dignity of Employees,
- j) Other Undesirable Behavior(s),

as well as all actions aiming at the occurrence of the Behavior(s) indicated in paragraphs a) - j) above, and actions related to the attempt to bring about their occurrence (hereinafter: **Undesirable Behavior(s)**).

- 2. Mobbing, discrimination, harassment, sexual harassment, and emotional abuse and examples of other Undesirable Behavior(s) are described in Appendix No. 1 of the Procedure.
- 3. If in doubt as to whether a particular act or omission qualifies as Undesirable Behavior(s) or if there are any questions regarding the interpretation of this Procedure, the Employee should ask the HR Business Partner or any other employee of the Human Resources Department (hereinafter: **the HR Department**) for assistance in clarifying the issue.

Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>		08.04.2025		

 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>

### III. EMPLOYER'S RIGHTS AND OBLIGATIONS

#### § 5


1. The Employer does not tolerate Undesirable Behavior(s) and monitors the working environment to prevent such behavior and eliminate its consequences without delay.
2. The Group takes all measures prescribed by the applicable legislation to ensure that the working environment is free of Undesirable Behavior(s).
3. In particular, the Employer is obliged to:
  - a) take all measures prescribed by law to prevent the Undesirable Behavior(s),
  - b) eliminate the social consequences of Undesirable Behavior(s), and
  - c) provide the necessary assistance to a person who has suffered Undesirable Behavior(s),
  - d) support people who have experienced the effects of Undesirable Behavior(s) (e.g., witnesses, members of the team in which the Undesirable Behavior(s) occurred) by, among other things, providing training,
  - e) development, implementation, and monitoring of the recovery process,
  - f) take other measures, appropriate in a specific situation, to eliminate existing and prevent the occurrence of other Undesirable Behavior(s) in the future.
4. Management staff is required to specifically support the Company in its activities related to the effective prevention of Undesirable Behavior(s), particularly by seeking to resolve conflicts between Employees before they escalate.

### IV. RIGHTS AND OBLIGATIONS OF EMPLOYEES

#### § 6

1. All Employees are expected to adhere to the principles set out in the Procedure and to help create a friendly working environment characterized by equal treatment and respect for colleagues.
2. The duties of the Employee include, in particular:
  - a) respecting the dignity and personal rights of all Employees and those who cooperate with the Employer on other legal bases,
  - b) applying the principles of social coexistence, kindness, and courtesy in their relations with each other, guaranteeing order and the maintenance of their well-being and mental health,
  - c) avoiding the use of Undesirable Behavior(s) in the workplace towards Employees or others,

Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>		08.04.2025		

 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>


- d) complying in their daily work with the applicable laws and procedures of the Employer,
  - e) responding to Undesirable Behavior(s) in accordance with the Employer's policies,
  - f) immediately informing the Employer or immediate supervisor of any manifestation of Undesirable Behavior(s) observed in the workplace, including those aiming at such actions, regardless of from whom they originate and to whom they concern,
  - g) refusing to participate in or support activities element of which is an Undesirable Behavior(s),
  - h) participating in training courses or workshops organized by the Employer on the prevention of Undesirable Behavior(s).
3. The Employer supports Employees in the area:
- a) of counteracting the emergence of Undesirable Behavior(s) and their escalation,
  - b) of clarifying situations at the earliest possible stage of their development,
  - c) of using the assistance of HR Business Partners and the HR Department when measures taken personally (or with the support of superiors) to resolve the conflict are ineffective, and when the number of Undesirable Behavior(s) increases or they take the form of physical or psychological violence, or when the escalation of the conflict has negative effects related to the effectiveness of the work process or affects the health of the Employee.
4. All Employees are required to attend meetings and activities undertaken by the Commission (referred to in § 14 of the Procedure) – at a time and place specified by the Commission.

## § 7

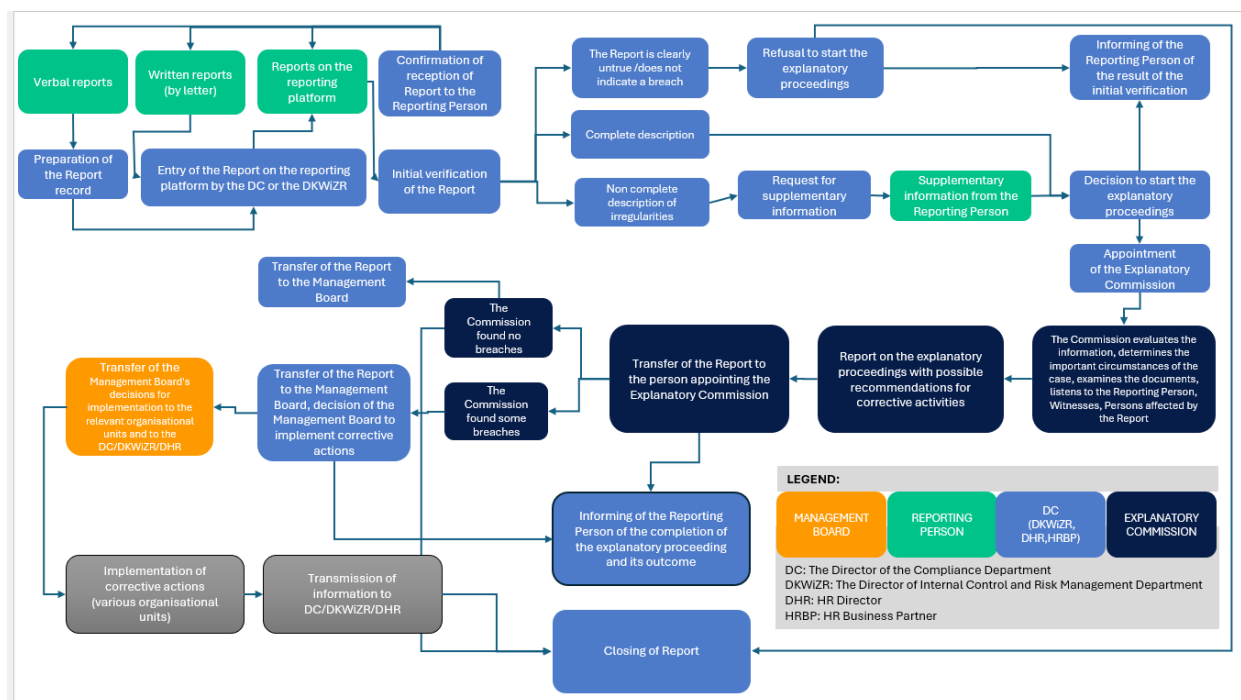
1. Any Employee who is convinced that he/she has experienced Undesirable Behavior(s), witnesses, or has knowledge of the occurrence of Undesirable Behavior(s) is obliged to make a report in accordance with the principles set out in Chapter V of the Procedure (hereinafter: **Report, Reporting Person**), which will enable the Employer to conduct explanatory proceedings and to take measures aimed at eliminating such events, mitigating their effects, and applying the sanctions stipulated by law to persons committing a given violation at the earliest possible stage of its occurrence.
2. The Reporting Person is protected against retaliation. As it is not possible to determine the identity of the Reporting Person in the case of an anonymous Report, the Reporting Person is not protected against retaliation.

Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>	Date	08.04.2025	Signature	



 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>

## V. PROCEDURE FOR REPORTING OF UNDESIRABLE BEHAVIOR




### § 8

- The reporting of Undesirable Behavior(s) may take place, at the choice of the Reporting Person:
  - orally,
  - via an online platform common to the Polenergia Group [Zgłoszam.polenergia.pl](https://zgloszam.polenergia.pl) (**Platform**) made available to all Employees for this purpose,
  - in writing,

in accordance with the principles set out in § 9-11 of the Procedure, respectively.
- Reporting can be done anonymously.
- In the event that the identity of a Reporting Person submitting an Anonymous Report is disclosed, or a Reporting Person discloses it himself/herself, the Reporting Person shall be treated as if he/she had made a Named Report.
- Once the missing information has been completed, the Reporting Person may submit the Report once again.

Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>		08.04.2025		

 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>


4. If a Reporting Person who submits a Report anonymously does not clearly indicate a communication address (either electronic, in the form of an e-mail, or a postal address), the Company is eligible to refrain from further contact with the Reporting Person.
5. If there are doubts about the identity of the Reporting Person, the Person authorized to receive Reports (defined below) will contact the Reporting Person for clarification. If doubts about the identity of the Reporting Person are not resolved, the Report will be considered anonymous. As far as possible, the Person authorized to receive Reports will inform the Reporting Person of this unless the Reporting Person has not provided contact details. In this case, the Person authorized to receive Reports will leave a note about the reasons for the qualification of the Report as an Anonymous Report.

## § 9

### Oral Reports

1. An Employee who considers that he/she has experienced Undesirable Behavior(s), witnessed Undesirable Behavior(s) or had knowledge of the occurrence of Undesirable Behavior(s) should report the matter in the first instance to the HR Business Partner assigned to the unit where the Employee works.
2. The role of the HR Business Partner is to make an initial assessment of the reported Undesirable Behavior(s), take action to effectively counter the reported Undesirable Behavior(s) for the future, and resolve the identified conflict (if possible).
3. Where, based on the information obtained, the HR Business Partner concludes that there is a risk of Undesirable Behavior(s) in a case, it is obliged to give it a formal course of action:
  - a) promptly identify the Report to the HR Department through a formal explanatory proceeding (in the case of minor cases Undesirable Behavior(s)), or
  - b) hand over the Report to be recognized by:
    - Director of the HR Department of Polenergia S.A. (**Director of the HR Department**),
    - Director of the Compliance Department of Polenergia S.A. (**Director of the Compliance Department**),
    - Director of the Internal Control and Risk Management Department of Polenergia S.A. (**Director of the Internal Control and Risk Management Department**),
    - the body supervising the Management Board of the Company – only in the case of Reports of Undesirable Behavior(s) committed by Members of the Management Board.
5. The Reporting Person may also report the Undesirable Behavior(s) to the Director of the HR Department or, particularly if the Report relates to the Director of the HR Department, to the Director of the Compliance Department or the Director of the Internal Control and Risk Management Department or, in the case of Reports relating to the Management Board of the Company, to the body supervising the Management Board of the Company

Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>		08.04.2025		

 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>

(Director of the HR Department, Director of the Compliance Department, and Director of the Internal Control and Risk Management Department, each individually hereinafter referred to as the **Receiver of the Report**).

6. The Receiver of the Report arranges a meeting with the Reporting Person as soon as possible from the date of the Report.
7. The Receiver of the Report or the person holding the Further Authorization shall make an accurate record of the interview with the Reporting Person and give him/her the opportunity to review the protocol made and to make notes on the protocol before approving them in accordance with clause 8 below.
8. The Reporting Person approves the protocol by signing it.
9. Further contact with the Reporting Person may be made in person or via contact details provided by the Reporting Person, as well as by using the Platform.

#### **§ 10**

##### **Reporting through the online platform**


1. The Reporting Person may send a Report of Undesirable Behavior(s) via the Platform provided by the Company by completing the form available therein.
2. Further contact with the Reporting Person may be made via the Platform or in person, according to his/her choice.

#### **§ 11**

##### **Written Reports**

1. The Reporting Person may make a Report of Undesirable Behavior(s) in writing, describing the Undesirable Behavior(s) and indicating all the information necessary to determine what the indicated Other Undesirable Behavior(s) consists of by placing the letter in a closed envelope and sending it to the address of the place of work by:
  - the Director of the HR Department, marked '**CONFIDENTIAL – To the Director of the HR Department in person**', or
  - the Director of the Compliance Department, marked '**CONFIDENTIAL – To the Director of Compliance Department in person**', or
  - the Director of the Internal Control and Risk Management Department, marked '**CONFIDENTIAL – To the Director of the Internal Control and Risk Management Department in person**'.
2. Further contact with the Reporting Person may be made in person or via contact details provided by the Reporting Person, as well as using the Platform.

Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>		08.04.2025		

 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>

## § 12


1. The Group authorizes the Director of the Compliance Department, the Director of the Internal Control and Risk Management Department, and the Director of the HR Department to accept and verify reports, to follow up on reports, to process personal data of reporters and persons affected by a report, and of others involved in the explanatory proceeding, and to commit to confidentiality (hereinafter: the **Authorization**).
2. The Authorization may include a provision that further authorizations may be granted for the receipt of reports and follow-up actions (**Further Authorization**). Further Authorization may, in particular, be granted to employees or cooperators of the Compliance Department, the Internal Control and Risk Management Department, and the HR Department.
3. The Receiver of the Report and any person holding a Further Authorization are obliged to maintain impartiality and independence. In the event of a potential conflict of interest, the Receiver of the Report and any person holding a Further Authorization shall:
  - a) exclude themselves from participation in the explanatory proceeding, and
  - b) hand over the Report and inform the other Reporting Person. In the event that the person accepting the Report is a person with Further Authorization, that person shall immediately inform and forward the Report to the Director of the Compliance Department or the Director of the Internal Control and Risk Management Department. If the person holding the Further Authorization is an employee or colleague of the Compliance Department, he or she will inform and forward the Report to the Director of Internal Control and Risk Management.
4. If a Report is received, the person(s) with Further Authorization and the supervisor of the Management Board of the Company shall, in the event of receipt of a Report, provide information on the Report and the manner in which it has been dealt with to the Director of the Compliance Department. The Director of the Compliance Department or his/her authorized person shall promptly enter this information on the Platform operated by the Group for the processing of Reports.

## § 13

### Minimum content of the Report

1. Regardless of the form chosen, the Report should include at least:
  - a) the name of the Employee submitting the Report, unless the Report is anonymous,
  - b) a presentation of the facts, including the identification of specific actions and Behavior(s) which, in the opinion of the Reporting Person, constitute Undesirable Behavior,
  - c) identification of the perpetrator(s) of the Undesirable Behavior,
  - d) identification of the Employee(s) who have suffered Undesirable Behavior,
  - e) the date or period of the event to which it relates, and

Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>		08.04.2025		

 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>

- f) indication of evidence (e.g., notes) in support of the circumstances cited (to the extent that the person providing information on the Undesirable Behavior(s) has such evidence).
2. The Report should be dated and signed by the Reporting Person, unless the Report is anonymous.

## **VI. PROCESSING OF REPORTS**

### **§ 14**


#### **Initial verification of the Report**

- Upon acceptance of a Report, the Receiver of the Report, or a person holding a Further Authorization, shall carry out an initial verification of the Report to determine whether the subject matter of the Report falls within the subject matter of the Procedure.
- If, due to the subject of the Report, it would be appropriate to apply the Procedure for Receiving and processing Internal Reports (Pillar I) or the Procedure for Receiving and Processing Other Irregularities (Pillar III), the Director of the HR Department, the Director of the Compliance Department, or the Director of the Internal Control and Risk Management Department shall issue a decision to hand over the case for consideration under the relevant procedure and shall immediately inform the Reporting Person of this fact, with a brief justification of the grounds for the decision.
- If the content of the Report, including an Anonymous Report, is insufficient and is not supplemented by the Reporting Person at the request of the Receiver of the Report, in particular:
  - does not contain a sufficient description of Undesirable Behavior, or
  - for other reasons indicated to the Reporting Person, the Report cannot be processed further and be dealt with in accordance with the Procedure.

The Report may be rejected at this stage without an explanatory proceeding. The rejection of the Report shall be the decision of the Director of Polenergia S.A.'s Compliance Department, the Director of Polenergia S.A.'s Internal Control and Risk Management Department, the Director of Polenergia S.A.'s HR Department, or the body supervising the Management Board (in case the Report concerns a Management Board Member). In such a case, the Receiver of the Report will leave a note on the Platform, including the reasons for leaving the case unprocessed.

- Once it has been confirmed that a Report should be processed under this Procedure, the Receiver of the Report or the person holding Further Authorization may:
  - hand over the case to the Director of the HR Department if, in his/her judgement, the case may be a minor matter that does not require further clarification and can be resolved directly by the HR Business Partner,

Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>		08.04.2025		

 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>


- b) hand over the case to the Commission for the Prevention of Mobbing and Discrimination and Other Undesirable Behavior(s) from the Employees Relations Area (hereinafter: **the Commission**) for explanatory proceeding. This occurs in particular when
- considers that the importance of the Undesirable Behavior(s) covered by the Report is significant,
  - the Undesirable Behavior(s) indicated in the Report is classified as probable and the matter requires further clarification.
3. Once the aforementioned decision has been taken, the Receiver of the Report or the person holding the Further Authorization shall, within a period of 7 days after it has been taken, forward to the notifying Employee a confirmation of the Report acceptance.
  4. The Receiver of the Report may contact the Reporting Person to obtain additional information about the Undesirable Behavior(s) at any stage of the explanatory proceeding.
  5. Withdrawal of the Report by the Reporting Person does not terminate the proceedings if, in the opinion of the Receiver of the Report, the information gathered in the case justifies the explanatory proceeding.
  6. If the Report is clarified in accordance with § 14 clause 2(a) of the Procedure, a note is drawn up after clarification and handed over to the Director of the Compliance Department.
  7. The Receiver of the Report shall not refer a case to the Commission if this would be unnecessary in order to clarify the matter, e.g., if there are or have been proceedings before the Commission in relation to the same behavior of the same person and a hearing of the Reporting Person would not reveal any new facts in the case.
  8. The Receiver of the Report may hand over a case to the Commission for explanatory proceeding, even though the Commission has already investigated the same conduct of the same person, if new circumstances come to light or new evidence is presented or indicated which could affect a different outcome of the explanatory proceeding.

## § 15

### Establishment and operation of the Commission

1. If the circumstances described in § 14 clause 2 letter b of the Procedure apply, the Receiver of the Report shall appoint a Commission and indicate its members.
2. The Commission shall be appointed for the respective Report. In the event that two or more Reports are found to be related or concern the same person, the Chairman of the Commission may combine the Commissions.
3. The purpose of the Commission is to conduct an explanatory proceeding of a Report of Undesirable Behavior(s) received by the Employer.
4. The Commission shall consist of at least 3 members.

Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>		08.04.2025		


 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>

5. A member of the Commission may be a person who warrants the proper exercise of the function entrusted to him/her, i.e., who does not give rise to any concern of breach of the principles of impartiality, independence, and confidentiality.
6. In particular, the following may be appointed to the Commission:
  - the Director of the Compliance Department or an Employee of the Compliance Department authorized by him/her,
  - the Director of the Internal Control and Risk Management Department or an Employee of the Internal Control and Risk Management Department authorized by him/her,
  - the Director of the HR Department or an Employee of the HR Department authorized by him/her,
  - a Member of the Ethics Commission referred to in the Polenergia Group Code of Ethics,
  - other employees of Polenergia Group companies,
  - third parties (including psychologists and legal advisers).
7. A member of the Commission may not be:
  - a) the person submitting the Report (i.e., the person identified as having suffered the Undesirable Behavior(s) or a third party),
  - b) a person identified as having suffered Undesirable Behavior(s) – where a report is made by a third person,
  - c) the person identified in the Report as the perpetrator of the Undesirable Behavior,
  - d) the Employee's immediate superior under a) and b),
  - e) other persons indicated in the Report – including, in particular, persons indicated as witnesses.
4. The Director of the Compliance Department determines the specific rules of operation of the Commissions conducting explanatory proceedings under the Procedure of Receiving and Processing Internal Reports referred to in the Reporting Person Protection Act (**Pillar I**), the Procedure for How to Proceed with Reports Concerning Mobbing, Discrimination, and Other Undesirable Behavior(s) in the Area of Employee Relations (**Pillar II**), and the Procedure for Receiving and Reviewing Reports on Other Irregularities (**Pillar III**) by regulations.

#### **§ 16**

1. The Employees summoned by the Commission to be heard shall be relieved for that time from performing official duties.
2. In justified cases, particularly due to the necessity to be relieved from official duties, a supervisor may be informed of the appointment of an Employee or Associate of the Company or of a witness in the context of proceedings conducted by the Commission. The information referred to in the previous sentence will not include details of the pending proceedings.

Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>		08.04.2025		

 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>

#### **§ 17**

1. The Employer, on its own initiative or at the request of the Commission, may consult a legal adviser or lawyer, a psychologist, a doctor, or other persons who are not members of the Commission, but whose knowledge and experience will be useful for the conduct of the explanatory proceeding.
2. The Commission elects a Commission Chairman from its members.
3. The Commission deliberates at meetings.
4. Meetings of the Commission shall be held at the Employer's premises or at any other place designated by the Chairman of the Commission, or remotely, and in any case at a location that ensures confidentiality.
5. The Commission shall take decisions by a simple majority. A member of the Commission may not abstain from voting. In the event of a tie, the Chairman of the Commission shall have the casting vote.
6. A member of the Commission may not participate in meetings or the work of the Commission if there are circumstances that significantly affect his or her impartiality and objectivity.


#### **§ 18**

##### **Conduct of the explanatory proceeding**

1. The Commission shall process the explanatory proceeding of the case with a view to determining whether the Undesirable Behavior(s) indicated in the Report has occurred and the circumstances in which the Undesirable Behavior(s) occurred.
2. In examining the case, the Commission acts in accordance with the rules of:
  - a) urgency,
  - b) confidentiality,
  - c) impartiality,
  - d) targeting a comprehensive clarification of the facts and resolution of the problem.
3. Proceedings before the Commission are confidential, which means that the members of the Commission are obliged to keep confidential the information they learn in connection with the performance of their duties as members of the Commission.
4. Proceedings before the Commission shall be conducted with respect for the rights and personal rights of the individuals involved, taking into account the principle of confidentiality. The entire proceedings, especially the evidence gathered, shall be subject to legal protection and may not be disclosed by the participants. Specifically, participants are required to strictly adhere to the provisions on the protection of personal data.
5. The parties to the Commission's explanatory proceeding are:

Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>		08.04.2025		



 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>

- a) an Employee who, according to the information, is or may be a person who has suffered because of Undesirable Behavior,
  - b) an Employee who is suspected of having engaged in Undesirable Behavior.
6. In the explanatory proceeding of the case, the Commission may request information and explanations from participants in the proceedings, including the Reporting Person. The Commission may also request other persons to provide explanations or to take a position. The Commission shall require such persons to make a declaration containing a commitment to confidentiality.
  7. The Employer shall grant a leave of absence to an Employee woman or a person who cooperates with the Company or Polenergia Group on another legal basis participating in the explanatory proceeding for the duration of his/her participation in the explanatory proceeding, whereby the Commission, when requesting the appearance of certain Employees, shall agree with them on the time of such appearance.
  8. The Commission shall hear the parties to the explanatory proceeding and other persons summoned by the Commission and shall take evidence in a manner that ensures the confidentiality of the explanations.
  9. In the event of conflicting explanations, the persons heard by the Commission may be confronted with each other, with their prior agreement.
  10. Parties to the explanatory proceeding shall be given the opportunity to present their views and any circumstances related to the Report.
  11. The Commission has the right to inspect the documentation relating to the Report.
  12. A note shall be drawn up of the meetings of the Commission. The note shall at least include the facts relating to the initiation and conduct of the meeting, including the content of the explanations given by the parties and persons summoned by the Commission.

## **§ 19**


### **Intervention and support activities**

During the proceedings, the Commission will recommend whether and what intervention actions should be taken against the potential perpetrator of the Undesirable Behavior(s) to stop it immediately in the workplace or in connection with work. The Commission will also determine the appropriate supportive actions to assist the person who has experienced the Undesirable Behavior. Additionally, intervention and supportive actions will be indicated for situations identified as conflictual during the explanatory proceedings.

## **§ 20**

In connection with a report of Undesirable Behavior(s) identified, the Commission may propose additional preventive and corrective activities that the Employer can take to prevent such occurrences in the future.

Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>		08.04.2025		

 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>

## § 21

### Explanatory proceeding report

1. A final report (hereinafter: **Report**) is drawn up from the explanatory proceeding.
2. The Report should include at least:
  - a) the presentation of the facts resulting from the Report,
  - b) a description of the actions taken,
  - c) presenting the conclusions of the actions taken, in particular the Commission's assessment of the occurrence or non-occurrence of Undesirable Behavior,
  - d) provide recommendations and possible follow-up activities.
3. The Report is forwarded to the Director of the HR Department and the Director of the Compliance Department. Handover of the Report should take place immediately after the signature of the Report by the members of the Commission.
4. The Director of the HR Department shall forward the Report to the Members of the Management Board of the Company and, if the Report relates to a Member of the Management Board of the Company, to the Members of the Supervisory Body of the Management Board of the Company.
5. The Report is confidential. Any disclosure of its content is decided by the Director of the HR Department, the Director of Compliance Department, or the Director of the Internal Control and Risk Management Department.

## § 22


1. In addition to the Report, a document (notification) containing the conclusions of the Report is also prepared and, to the extent and in the appropriate form, submitted to the Reporting Person.
2. Notification of the Report's conclusions, to the extent and in the appropriate form, shall be in writing to the person identified in the Report as being subject to mobbing, discrimination, harassment, sexual harassment, or other Undesirable Behavior, including that tending to mobbing or discrimination, harassment, sexual harassment, and, where appropriate, also to the Reporting Person who has not suffered Undesirable Behavior. The Commission shall also communicate these conclusions in writing to the person who is alleged to have committed (according to the Report) or has committed (according to the Report) the specified Undesirable Behavior.

## VII. LIABILITY FOR MOBBING AND DISCRIMINATION

## § 23

1. Persons committing Undesirable Behavior(s) are subject to liability as provided by the applicable laws, in particular the Labor Code, the Criminal Code Act of 6 June 1997, and the Civil Code Act of 23 April 1964.

Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>		08.04.2025		


 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>

2. The use of Undesirable Behavior(s), assistance in such actions, encouraging or creating situations encouraging such actions, as well as tolerating their manifestations, may be considered, in specific circumstances, as a breach of basic employee duties and result in sanctions provided for by law, in particular the application of disciplinary penalties or termination of the Agreement without notice due to the employee's fault, i.e., pursuant to Article 52 § 1 paragraph 1 of the Labor Code.

#### **§ 24**

1. Based on the Report presented by the Commission, the Management Board of the Employer shall decide whether further actions are necessary. In particular, if the Employer is of the opinion, based on the Report presented to it, that Undesirable Behavior(s) has occurred, it may apply the legal measures set out in clause 2 below to the Employee who has committed Undesirable Behavior.
2. In the event that Undesirable Behavior(s) is found to have been committed, depending on the circumstances, the findings made, and the scale of the phenomenon, the Employer shall, in accordance with the applicable legislation, take a decision on:
  - a) punishing the offender with a disciplinary penalty (warning, reprimand),
  - b) termination of the offender's terms and conditions of employment and remuneration,
  - c) termination of the Agreement with the offender by notice,
  - d) termination of the employment agreement with the offender without notice due to the employee's fault, pursuant to Article 52 § 1 paragraph 1 of the Labor Code,
  - e) the transfer of the injured Employee (at his/her request or with his/her consent) to a position where his/her skills can be fully utilized, with a 12-month guarantee of no change in base pay to the detriment of the Employee,
  - f) taking other measures appropriate to the situation (e.g., employee briefings, employee training, mediation).
3. In the event that it is found that the Employee who reports the Undesirable Behavior(s) has intentionally included false information, the Employer may consider appropriate legal remedies in respect of that Employee, including termination of the Agreement of Employment with or without notice through the fault of the Employee.
4. If the reported Undesirable Behavior(s) by the Employee turns out to be false, the Employee reporting this information will not suffer any negative consequences as a result of reporting it, provided that the Employee acted in good faith.
5. Information on the follow-up activities taken and their results is forwarded to the Director of the Compliance Department and the Director of the HR Department.

Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>		08.04.2025		

 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>

#### § 25

1. Any measures or actions of a retaliatory nature against Employees reporting information on Undesirable Behavior(s) while acting in good faith are prohibited.
2. Whenever an action is reported that could be a sign of retaliation, the Reporting Person must inform the Director of the Compliance Department, the Director of the HR Department, or the Director of the Internal Control and Risk Management Department in order to assess whether the action in question is related to the report and to take any measures that may be required to prevent and remedy any retaliation.

### VIII. CONFIDENTIALITY

#### § 26


1. In the course of processing the Report of Undesirable Behavior, the Company ensures the confidentiality of the reporting Employee's data and protection of his/her identity, as well as the identity of persons affected by the Report of Undesirable Behavior(s) and those participating in the explanatory proceeding (including witnesses). The Company also ensures the confidentiality of the content of the Reports of Undesirable Behavior(s) and the information collected during the explanatory proceeding, even in the event that the Report of Undesirable Behavior(s) proves to be unfounded. All persons undertaking activities related to the report, particularly during the explanatory proceeding – including the Receiver of the Report, persons with Further Authorization, the Department, members of the Commission, the Reporting Person, and witnesses – are obliged to keep the course of the proceedings and the information they acquire in connection with the Report and their participation in the proceedings confidential, as well as to sign a confidentiality statement constituting Appendix No. 4 to the Procedure.
2. In the course of the proceedings, confidential information is subject to disclosure by the Director of the Compliance Department, the Director of the HR Department, or the Director of the Internal Control and Risk Management Department only to persons authorized by them and only to the extent necessary to justify the course of the proceedings and the nature of the Undesirable Behavior(s) under explanatory proceeding (hereinafter: **Authorized Persons**).
3. In the course of the proceedings, the Company shall ensure that the rights of the persons affected by the Report of Undesirable Behavior(s) are protected by providing them with the right to a hearing and the right to be heard.

### IX. PROTECTION OF PERSONAL DATA

#### § 27

1. With the express consent of the Reporting Person, his/her personal data may be disclosed to persons other than Authorized Persons.

Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>		08.04.2025		

 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>


2. Once a Report has been received, the personal data of the persons involved in the explanatory proceeding are processed to the extent necessary for the acceptance of the Report, the conduct of the explanatory proceeding, and any follow-up activities.
3. Personal data that is not relevant to the processing of the Report shall not be collected and, if accidentally collected, shall be deleted immediately. The deletion of such personal data shall take place 14 days after the determination that it is not relevant to the proceedings. A general note shall be made of the deletion process indicating the date of the deletion, the person carrying out the deletion, the source of the personal data, the date on which it was determined that the personal data is not relevant to the proceedings in question, and the reasons for the deletion. The note shall not indicate the personal data that were subject to erasure.
4. Personal data processed in connection with the acceptance of a Report, the conduct of proceedings, or the undertaking of any follow-up actions, and documents relating to that Report, shall be retained for a period of 3 years after the end of the calendar year in which the external Report was handed over to the public authority competent to take follow-up action or the follow-up action was completed, or after the proceedings initiated by those actions.
5. As far as possible, the Group shall comply with its duty of information to the Reporting Person and to the persons whose data appear in the Report, in accordance with the model constituting Appendix No. 3 to the Procedure.
6. The fulfillment of the information obligations is supervised by the Receiver of the Report, who is in particular obliged to demonstrate the fulfillment of the obligation in accordance with the principle of accountability.
7. The Group shall grant authorization for the processing of personal data to persons who do not have an Authorization or to whom no Further Authorization has been granted and who are members of the Supervisory Body of the Management Board of the Company, are members of the Commission, or have otherwise been involved by the Receiver in the explanatory proceeding. At the request of a person, the aforementioned Authorization shall be drawn up in duplicate.
8. A model authorization to process personal data is Appendix No. 2 to this Procedure.

## **X. REGISTER OF PROCEEDINGS CONDUCTED BY THE COMMISSION**

### **§ 28**

1. The Group maintains a register of Undesirable Behavior(s) (hereinafter: the **Register**).
2. The Register is maintained by the Director of the Compliance Department or the Director of the Internal Control and Risk Management Department, acting in place of the Director of the Compliance Department, in such a way as to ensure the confidentiality of the data contained therein.
3. The entry in the Register is made by the Director of the Compliance Department or the Director of the Internal Control and Risk Management Department, acting in place of the Director of the Compliance Department, or by an Authorized

Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>		08.04.2025		

 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>

Employee of the Compliance Department on the basis of the Reports handed over to the Commission for examination or information received from the Director of the HR Department.


4. The Register includes:
  - a) Report number,
  - b) the subject matter of the alleged Undesirable Behavior,
  - c) the personal data of the Reporting Person and the Person concerned necessary to identify them,
  - d) the Reporting Person's contact address,
  - e) the date on which the Report was submitted,
  - f) information on follow-up activities taken,
  - g) the date of completion of the case.
5. The personal data and other information in the Register shall be retained for a period of 3 years after the end of the calendar year in which the follow-up actions were completed or the proceedings initiated by those actions are completed.
6. The Director of the Compliance Department and the Director of the Internal Control and Risk Management Department are responsible for storing and archiving the Reports prepared in such a way as to ensure the confidentiality of the data contained therein.

## **XI. PREVENTION ACTIVITIES**

### **§ 29**

1. Irrespective of the actions taken in relation to the occurrence of Undesirable Behavior(s) as provided for in the Labor Regulations and the rules of the Labor Code, the Employer shall take preventive activities to prevent its occurrence.
2. As part of preventive activities, the Employer shall, in particular:
  - a) monitor the working environment to prevent the occurrence of Undesirable Behavior(s),
  - b) analyze cases of Undesirable Behavior(s) or the risk of their occurrence in order to avoid them in the future,
  - c) provide training on the issue of Undesirable Behavior(s) and how to prevent them,
  - d) organize training and undertake all kinds of educational activities to raise awareness of Undesirable Behavior(s) among Employees,

Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>		08.04.2025		

 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>

- e) encourage Employees to communicate openly about any situation that may lead to Undesirable Behavior(s) or be related to them,
- f) care for an organizational culture in the workplace, take steps to promote ethical behavior, and amicable conflict resolution.

## **XII. FINAL PROVISIONS**

### **§ 30**

1. This Procedure shall enter into force 7 days after it has been communicated to Employees in the manner adopted in the Company, for an indefinite period.
2. It is the responsibility of each Employee to familiarize himself/herself with the Procedure and to make a declaration that he/she has read it.
3. Records relating to proceedings under this Procedure shall be retained by the Employer for a period of not less than 3 years from the date of completion of the proceedings in question, in the Compliance Department, in a secure location without access by unauthorized persons.
4. In matters not covered by the Procedure, the generally applicable provisions shall apply accordingly, including labor law.
5. The Employer shall provide training to Employees on this Procedure.
6. The Employer reviews the Procedure once a year.
7. In the event of amendments to the Procedure, the Employer shall communicate the consolidated text of the Procedure to the Employees.

## **XIII. LIST OF APPENDICES**


Appendix No. 1: Definitions and description of individual types of Undesirable Behavior(s)

Appendix No. 2: GDPR mandate

Appendix No. 3: Template of information obligations

Appendix No. 4: Confidentiality statement

Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>		08.04.2025		

 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>


## APPENDIX NO. 1: DEFINITIONS AND DESCRIPTION OF TYPES OF UNDESIRABLE BEHAVIOR(S)

### MOBBING

<p><b>Mobbing is:</b></p> <p>an act or conduct suffered by or directed against an Employee, consisting of</p> <ul style="list-style-type: none"> <li>▪ persistent and prolonged harassment or intimidation,</li> <li>▪ inducing an underestimated assessment of professional suitability,</li> <li>▪ causing or intended to cause humiliation or ridicule, <b>and</b></li> <li>▪ isolating him or her or eliminating him or her from the team of co-workers.</li> </ul> <p><b>In order for the behavior in question to be considered mobbing, all of the above elements must occur together.</b></p> <p>The perpetrator of mobbing does not have to be a Company Employee.</p>	<p><b>Mobbing is not (open catalog):</b></p> <ul style="list-style-type: none"> <li>▪ individual Behavior(s), despite the fact that, depending on the circumstances, they may be other Undesirable Behavior(s),</li> <li>▪ conflicts with other Employees as long as they are not accompanied by the mobbing Behavior(s) indicated above,</li> <li>▪ instances of work inspections that are not intended to harass the Employee, including in terms of periodic inspection of work-related mail, incoming and outgoing from company mailboxes, or to monitor Employee activity, in particular by the control of websites visited,</li> <li>▪ enforcing lawful work instructions, provided that such actions are within the limits of the law and do not violate anyone's dignity, and furthermore are not persistent or prolonged and are not intended to harass or intimidate,</li> <li>▪ legitimate criticism relating to an Employee's or team's performance, efficiency, or level of commitment to particular tasks,</li> <li>▪ commissioning the preparation of reports, statements, or other materials for the purpose of periodically monitoring the performance of duties and the completion of assigned tasks,</li> <li>▪ noticing (even frequently) actions or behaviors that are offensive, indecent, or otherwise breach</li> </ul>
--	---

Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>		08.04.2025		




 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>

	<p>general rules of conduct, including on behavior inconsistent with the Company's values,</p> <ul style="list-style-type: none"> <li>▪ differential treatment by assigning or delegating tasks that take into account an Employee's individual competencies, qualifications, or skills, provided that this is not intended to harass the Employee,</li> <li>▪ adequate measures to prevent the escalation of conflicts between Employees, even if they result in the forced separation of the person committing the Undesirable Behavior(s) from people experiencing Undesirable Behavior(s),</li> <li>▪ communicating plans to downsize, even if this would cause stress to Employees,</li> <li>▪ increased workload due to the volume of commitments accepted, which can be differentiated in individual periods. In particular, it is not mobbing to oblige Employees to work overtime when this is based on the needs of the Company and is not intended to harass individual Employees.</li> </ul>
--	--

#### UNEQUAL TREATMENT IN TERMS OF REMUNERATION

<p><b>Unequal treatment in terms of remuneration is:</b></p> <ul style="list-style-type: none"> <li>▪ Worse treatment of an employee in terms of remuneration for work of equal value or equal value.</li> <li>▪ Equal work is considered to be work in the same position or work requiring</li> </ul>	<p><b>The remuneration of two employees may differ:</b></p> <ul style="list-style-type: none"> <li>▪ When work requires Employees with different professional qualifications, evidenced by documents provided for in separate regulations or by practice and professional experience, and comparable responsibility and effort.</li> </ul>
--	--

Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>	Date	08.04.2025	Signature	

 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>

equal qualifications, experience, effort, skills, and responsibility.


- Work of equal value is considered to be work the performance of which requires workers to have comparable professional qualifications, evidenced by documents or work experience and practice, as well as comparable responsibility and efforts.
- Even when working in the same position, individual employees' salaries may differ if there are objective reasons for differentiation – Employees may have, for example, different qualifications, different work performance, or different lengths of service. **In this case, even when they are working in the same position, they will not be treated unequally.**

- When there are objective reasons to differentiate the remuneration of employees.

## DISCRIMINATION

<p><b>Discrimination is:</b></p> <p>the worse treatment of an Employee or a group of Employees distinguished on the basis of a given characteristic (criterion), regardless of whether the differentiation is direct or indirect (it is the result of the Report of objective criteria).</p> <p>Such a criterion may be gender, age, disability, race, religion, nationality, political conviction, trade union membership, ethnic origin, sexual orientation, employment for a fixed or indefinite period of time, as well as full-time or part-time employment or any other criterion differentiating Employees.</p>	<p><b>In particular, discrimination is not:</b></p> <ul style="list-style-type: none"> <li>▪ the Report on seniority (or age) criteria in determining the terms and conditions of employment and dismissal of Employees, remuneration and promotion rules, and access to training,</li> <li>▪ differentiation of employees by granting additional rights to vulnerable workers (e.g., parents of children),</li> <li>▪ differentiation of Employees, which is objectively justifiable, even if one of the Employees stands out in some way (e.g., in terms of work performance),</li> </ul>
--	---

Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>		08.04.2025		


 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>

<p>In order to determine that a particular behavior constitutes discrimination, a joint statement is necessary that:</p> <ul style="list-style-type: none"> <li>Employees are treated unequally,</li> <li>Employees who are treated unequally are in the same factual and legal situation (there is no provision requiring the Company to differentiate between specific groups of employees).</li> </ul> <p>The reason for the different treatment is a criterion that distinguishes them.</p>	<ul style="list-style-type: none"> <li>the application of the age criterion for the termination of agreements for reasons not attributable to employees, if this is not the only criterion for termination,</li> <li>differentiating between Employees based on the content of the applicable legislation,</li> <li>equalizing opportunities for employees who are discriminated against in the labor market,</li> <li>to terminate the terms and conditions of employment with regard to working hours if this is justified by reasons not related to the employees, without invoking any other reason or the other reasons listed.</li> </ul>
---	---

#### HARASSMENT

<p><b>Harassment is:</b></p> <ul style="list-style-type: none"> <li>Undesirable Behavior(s) which have the purpose or effect of violating the dignity of the Employee and creating an intimidating, hostile, degrading, humiliating, or derogatory atmosphere towards the Employee.</li> <li>For harassment to occur, the two elements indicated above must occur together (i.e., violation of dignity and creation of a hostile atmosphere).</li> <li>In order for the behavior in question to be considered harassment, it must be the consequence of singling out an Employee on the basis of a particular characteristic (criterion) – e.g., someone must have been subjected to such behavior because of his or her age, gender, sexual orientation, disability, or other characteristics listed in the description of discrimination.</li> <li>Examples of harassment can include, for example, malicious and overstepping the bounds of social intercourse, comments and jokes relating to a protected characteristic (e.g., disability or gender), which are</li> </ul>	<p><b>Harassment is not:</b></p> <ul style="list-style-type: none"> <li>Behavior(s) that constitute a ‘response’ to the Undesirable Behavior(s) of another Employee (even though it may be treated as other Undesirable Behavior(s) in its own right),</li> <li>Jokes that do not exceed generally accepted boundaries as long as they are clearly accepted within a certain circle of employees and their purpose or effect is not to violate the dignity of any Employee (even though they may be treated on their own as other Undesirable Behavior(s)),</li> <li>Behavior(s) that objectively should not cause an intimidating, hostile, humiliating, or offensive atmosphere for an Employee.</li> </ul>
---	---

Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>	Date	08.04.2025	Signature	

 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>

aiming to violate someone's dignity or that are objectively likely to violate such dignity (or lead to intimidation).


For behavior to be harassment, the person concerned should signal that he or she does not agree with the behavior.

For the assessment of whether behavior is harassment, what matters more is not the subjective feeling of the person concerned, but how it should objectively be treated.

### SEXUAL HARASSMENT

<p><b>Sexual harassment is:</b></p> <ul style="list-style-type: none"> <li>Conduct of a sexual nature, or relating to the sex of the employee, which has the purpose or effect of violating the employee's dignity, in particular by creating an intimidating, hostile, degrading, humiliating, or offensive environment towards the employee.</li> <li>This behavior may consist of physical, verbal, or non-verbal elements.</li> <li>In order for the behavior in question to be considered sexual harassment, it must involve sex or sexuality (including an aspect of sexual orientation).</li> </ul> <p>Examples of sexual harassment will not only include behavior that violates bodily integrity, but can also be examples of:</p> <ul style="list-style-type: none"> <li>solicitation of sexual relations,</li> <li>malicious and coercive comments and jokes relating to sex or sexuality,</li> </ul>	<p><b>Sexual harassment is not:</b></p> <ul style="list-style-type: none"> <li>Behavior(s) that constitute a 'response' to sexual behavior on the part of another person (even though it may and should be treated as other Undesirable Behavior(s) in its own right),</li> <li>Jokes relating to gender or sexuality, not exceeding generally accepted limits, provided that they are clearly accepted in a specific circle of employees, their purpose or effect is not to violate the dignity of a specific Employee and their (even passive) recipient is not someone whose dignity they would violate (although they may be treated independently as other undesirable behavior),</li> <li>Behavior(s) that take place with the consent of the other party, provided that the person concerned has the opportunity and freedom to make an unrestricted decision in this regard (is not in a position of victim in the relationship).</li> </ul>
--	--

Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>		08.04.2025		


 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>

<ul style="list-style-type: none"> <li>▪ inappropriate comments or clearly inferior treatment of individuals based on their gender or sexuality, with the aim or effect of violating someone's dignity,</li> <li>▪ making sexual advances that are unwanted by the other party,</li> <li>▪ engaging in unwanted verbal harassment of a sexual nature,</li> <li>▪ gestures with sexual connotations,</li> <li>▪ displaying undesirable pornographic content in the workplace,</li> <li>▪ making obscene allusions.</li> </ul> <p>If the person who has experienced such behaviors is not intimidated by the perpetrator, in order for the behavior to be considered sexual harassment, the person concerned should signal that they do not consent to such behavior.</p>	
---	--

#### EMOTIONAL ABUSE

<b>Emotional abuse is:</b> <ul style="list-style-type: none"> <li>▪ harassment or intimidation,</li> <li>▪ Behavior(s) causing a lower assessment of professional competence,</li> <li>▪ comments causing or intended to humiliate or ridicule,</li> <li>▪ isolation within the team,</li> <li>▪ malicious and inappropriate comments and jokes intended to mock a person,</li> <li>▪ offensive gestures,</li> <li>▪ mockery of views and knowledge,</li> </ul>	<b>Emotional abuse is not:</b> <ul style="list-style-type: none"> <li>▪ Jokes that do not exceed generally accepted boundaries, as long as they are clearly accepted within a given circle of employees, and their purpose or effect is not to violate the dignity of a specific Employee and the (even if passive) recipient is not someone whose dignity they would violate.</li> </ul>
---	---

Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>		08.04.2025		

 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>

<ul style="list-style-type: none"> <li>the use of manipulation aimed, among other things, at causing a lowering of self-esteem.</li> </ul>	
--	--


#### **OTHER UNDESIRABLE BEHAVIOR(S)**

Although individual Behavior(s) may not meet the conditions to be considered mobbing, unequal treatment, discrimination, harassment, or sexual harassment, as long as they may lead to the violation of someone's dignity, escalate conflicts, negatively affect the psychological comfort or sense of security of individual employees, interfere with proper teamwork, or be perceived as violence (physical or psychological), they should be considered Undesirable Behavior(s) that employees should avoid in the workplace. If encountered, these Behavior(s) should be brought to attention so that they cease to occur in the future.

**The following types of behavior, among others, are recognized as Undesirable Behavior(s) in the Company:**


- restricting employees' ability to speak unless objectively justified in a given situation,
- constant interruptions of speech,
- restriction by colleagues to speak out,
- responding to notices by shouting, making loud excuses, and slandering,
- constantly criticizing the work being done without noticing which aspect of the work could be improved,
- publicly commenting on the private lives of other employees,
- harassment by telephone (stalking),
- verbal threats and threats,
- written threats,
- limiting contact through demeaning, humiliating gestures, or glances,
- expressing oneself allusively without formulating one's thoughts directly,
- strenuously avoiding conversations with a colleague without indicating the reasons,
- not being able to speak up (e.g., cutting off conversations),
- unjustified isolation/separation from colleagues,
- prohibiting Employees from talking to a particular person,

Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>		08.04.2025		

 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>

- not calling, ignoring, treating someone 'like air', or not even answering a 'hello'.
- speaking badly about this person,
- spreading rumors,
- making attempts at ridicule (e.g., public humiliation),
- suggesting mental illness,
- ridiculing of disability or infirmity,
- parodying the way a person walks, speaks, or gestures in order to ridicule the person,
- negative commentary on political or religious beliefs,
- jokes that cross the boundaries of social coexistence and ridicule other employees
- ridiculing of private life,
- mockery of nationality,
- being forced to perform work that violates personal dignity,
- false (negative) assessments of work engagement,
- questioning the validity and advisability of actions or decisions taken,
- giving offensive nicknames and nicknames,
- advances or verbal sexual proposals.
- taking away work (e.g., not giving any work at all or assigning such broad and generally formulated tasks that, in effect, the employee has to look for work themselves),
- unjustified withdrawal of work previously assigned to be carried out,
- commissioning work that is objectively pointless or useless,
- unjustifiably assigning tasks below the employee's skills or devaluing work (e.g., by assigning generally insignificant tasks or belittling work performance),
- ordering the performance of tasks that are objectively offensive to the employee and that violate a person's dignity,
- assigning tasks that exceed one's capabilities and competencies, with the aim of discrediting,
- threatening physical violence,
- use of minor physical violence,
- physical or psychological abuse.


Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>		08.04.2025		

 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>

THIS DIRECTORY IS ONLY AN EXAMPLE CATALOGUE OF THE BEHAVIOR(S) MENTIONED. IF YOU BELIEVE THAT A CERTAIN BEHAVIOR SHOULD NOT TAKE PLACE IN THE COMPANY, DUE TO GENERALLY ACCEPTED PRINCIPLES OR OUR VALUES, PLEASE ASK AN HR BUSINESS PARTNER TO EVALUATE THE SITUATION.

Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>		08.04.2025		



 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>

## APPENDIX NO. 2: TEMPLATE OF AN AUTHORIZATION TO PERSONAL DATA PROCESSING

\_\_\_\_\_  
(place and date)

### AUTHORIZATION TO PERSONAL DATA PROCESSING

Pursuant to Article 29 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (Official Journal of the EU L 119 of 04.05.2016, p. 1; Official Journal of the EU L 127 of 23.05.2018, p. 2; and Official Journal of the EU L 74 of 04.03.2021, p. 35), hereinafter referred to as 'GDPR', I authorize Mr./Ms.:

Name: \_\_\_\_\_

Position: \_\_\_\_\_

to process personal data electronically and on paper on behalf of [...] (hereinafter referred to as '**Employer**') within the scope of his/her official duties concerning the receipt and processing of reports of Undesirable Behavior(s) and participation in the Commission referred to in the Procedure of how to proceed with reports of mobbing, discrimination, and other Undesirable Behavior(s) from the HR area in [...]. The scope of data includes ordinary and sensitive data indicated in the report of Undesirable Behavior(s) or obtained during the clarification of the report.


The authorization covers the processing of personal data to the extent and for the purposes necessary for the explanatory proceeding procedure, i.e., in particular for the initial verification of the Report of Undesirable Behavior, the explanatory proceeding, and the follow-up activities.

This authorization shall be valid from the date on which it is granted until it is revoked, but no later than the termination of your employment relationship. This authorization may be revoked at any time with immediate effect.

\_\_\_\_\_  
(signature of the authorizing person)

I hereby declare that I am aware of the criminal, civil, and administrative liability for the processing of personal data beyond the scope of and contrary to this authorization.

Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>		08.04.2025		

 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>


At the same time, I hereby declare that I am aware of the principles for the processing of personal data set out by the data protection legislation, including the GDPR, and I undertake to strictly comply with them.

\_\_\_\_\_  
(signature of the person receiving the authorization and date)

I further declare that I undertake to keep confidential all information and personal data obtained from me, as well as documents disclosed to me or produced by me in the course of my professional duties related to the Procedure of how to proceed with Reports Concerning Mobbing, Discrimination, and Other Undesirable Behavior(s) from The HR Area in [...].

\_\_\_\_\_  
(signature of the person receiving the authorization and date)

Prepared by:	<i>Izabela Kozłowska</i>	Date	08.04.2025	Signature	
Approved:	<i>Management Board</i>		08.04.2025		

 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>


## APPENDIX NO. 3: TEMPLATE OF INFORMATION OBLIGATIONS

### INFORMATION OBLIGATION ON THE REPORTING PERSON

Pursuant to Article 13(1) and (2), of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27.04.2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (Official Journal of the EU L 119 of 04.05.2016, p. 1; Official Journal of the EU L 127 of 23.05.2018, p. 2; and Official Journal of the EU L 74 of 04.03.2021, p. 35), hereinafter referred to as 'GDPR', we inform you that:


1. The Controller of your personal data collected in relation to your Report of Undesirable Behavior(s) is Polenergia S.A., with its registered office in Warsaw (address: Krucza 24/26, 00-526 Warsaw), entered in the Register of Entrepreneurs of the National Court Register maintained by the District Court for the Capital City of Warsaw in Warsaw, XII Economic Division of the National Court Register, under KRS: 0000026545, NIP: 5261888932, REGON: 012693488, share capital: PLN 154 437 826.00, paid in full.
2. In matters related to the protection of personal data, you may contact via [RODO@polenergia.pl](mailto:RODO@polenergia.pl) or by post at Polenergia S.A., Krucza 24/26, 00-526 Warsaw.
3. The Controller processes your personal data on the basis of clause 6(1)(c) of the GDPR in conjunction with the provisions arising from the Labor Code relating to the need to prevent mobbing, discrimination, and other Undesirable Behavior(s) in the field of HR in the workplace (including Article 943§ 1, Article 18(3a), Article 94 paragraph 2b in connection with Article 11(1), and Article 94 paragraph 10 of the Labor Code), as well as guided by the welfare of employees and the need to protect them from Behavior(s) that may negatively affect their sense of security and psychological comfort, including enabling you to report Undesirable Behavior(s) and fulfilling the obligations imposed in connection with your report. Where you hand over special categories of personal data as defined in Article 9(1) of the GDPR, the Controller processes it on the basis of Article 9(2)(b) GDPR, i.e., the necessity to fulfil the Controller's obligations and specific rights in the field of employment law.
4. Your personal data will be retained for a period of 3 years after the end of the calendar year in which the follow-up actions have been completed or the proceedings initiated by these actions have been concluded. The deadline for deletion of the data may be extended by the period of limitation of claims if the processing of your personal data is necessary for the establishment or explanatory proceedings of possible claims or the defense against such claims.
5. Your provision of personal data is voluntary.
6. Your personal data may be disclosed to law firms or specialized entities in a given field cooperating with the Controller for the purposes specified in this information clause. In addition, your personal data may be disclosed to institutions authorized by law to the extent and for the purposes that result from the provisions of generally applicable law.
7. You have the following rights:
  - a. The right to access personal data and to receive a copy of personal data subject to processing (Article 15(1) and (3) of the GDPR),
  - b. The right to rectification of personal data (Article 16 of the GDPR),

Prepared by:	<i>Izabela Kozłowska</i>	Date		Signature	
Approved:	<i>Management Board</i>				

 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>

- c. The right to erasure of personal data under the circumstances provided for in Article 17 of the GDPR,
  - d. The right to restrict the processing of personal data in the cases indicated in Article 18 of the GDPR,
  - e. The right to data portability to another controller in the cases indicated in Article 20 of the GDPR,
  - f. The right to lodge a complaint with the President of the Office for Personal Data Protection if you consider that the processing of your personal data violates the provisions of the GDPR (UODO, Stanistawa Moniuszki 1A, 00-014 Warszawa, Poland),
  - g. To the extent that your data is processed on the basis of your consent (Article 6 (1a) GDPR or Article 9 clause 2a of the GDPR) – you have the right to withdraw your consent to data processing at any time. The withdrawal of consent does not affect the lawfulness of the processing carried out on the basis of your consent prior to its withdrawal,
  - h. To the extent that your data is processed on the basis of a legitimate interest of the controller (Article 6 (1f)) – you have the right to object, at any time, to the processing of your personal data.
8. Your personal data will not be transferred outside the European Economic Area or to international organizations.
9. You will not be subject to a decision that is based solely on automated processing, including profiling, that produces legal effects on you or similarly significantly affects you.

Prepared by:	<i>Izabela Kozłowska</i>	Date		Signature	
Approved:	<i>Management Board</i>				


 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>

**INFORMATION OBLIGATION TO OTHER PERSONS (OBTAINED IN THE CONTEXT OF A RECEIVED  
REPORT AND EXPLANATORY PROCEEDING)**

Pursuant to Article 14(1) and (2) or Article 13(1) and (2) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation) (Official Journal of the EU L 119 of 04.05.2016, p. 1; Official Journal of the EU L 127 of 23.05.2018, p. 2; and Official Journal of the EU L 74 of 04.03.2021, p. 35), hereinafter referred to as 'GDPR', we inform you that:

1. The Controller of your personal data is Polenergia S.A., with its registered office in Warsaw (address: Krucza 24/26, 00-526 Warsaw), entered in the Register of Entrepreneurs of the National Court Register by the District Court for the City of Warsaw in Warsaw, XII Economic Division of the National Court Register, under KRS: 0000026545, NIP: 5261888932, REGON: 012693488, share capital: PLN 154,437,826.00, paid in full.
2. In matters related to the protection of your personal data, you can contact us by e-mail at [RODO@polenergia.pl](mailto:RODO@polenergia.pl) or by post at Polenergia S.A., Krucza 24/26, 00-526 Warsaw.
3. We process your personal data indicated in the Report of Undesirable Behavior(s) or your personal data that is collected during the course of the explanatory proceeding, including from you, and that is necessary for the consideration of the Report of Undesirable Behavior(s) and any follow-up activities. The personal data we process may include, in particular, your name, contact details, and other personal data you have provided to us.
4. The Controller processes your personal data on the basis of clause 6(1)(c) of the GDPR in conjunction with the provisions arising from the Labor Code relating to the need to prevent mobbing, discrimination, and other Undesirable Behavior(s) in the field of HR in the workplace (including Article 943§ 1, Article 18(3a), Article 94(2b) in conjunction with Article 11(1) and Article 94(10) of the Labor Code), and guided by the well-being of employees and the need to protect them from Behavior(s) that may negatively affect their sense of security and psychological comfort, in order to fulfill the obligations imposed in connection with the Report of Undesirable Behavior. In the case of the processing of special categories of personal data as defined in Article 9(1), the Controller processes it on the basis of Article 9(2)(b) of the GDPR, i.e., the necessity to fulfill the obligations and specific rights of the Controller in the field of labor law.
5. Your personal data will be retained for a period of 3 years after the end of the calendar year in which the follow-up actions have been completed or the proceedings initiated by these actions have been concluded. The deadline for deletion may be extended by the period of limitation of claims if


Prepared by:	<i>Izabela Kozłowska</i>	Date		Signature	
Approved:	<i>Management Board</i>				

 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>

the processing of your personal data is necessary for the establishment, explanatory proceeding, or defense of possible claims.

6. Your personal data may be disclosed to law firms or specialized entities in a given field cooperating with the Administrator for the purposes specified in this information clause. In addition, your personal data may be disclosed to institutions authorized by law to the extent and for the purposes that result from the provisions of generally applicable law.
7. You have the following rights:
  - a. The right to access personal data and to receive a copy of personal data subject to processing (Article 15(1) and (3) of the GDPR),
  - b. The right to rectification of personal data (Article 16 of the GDPR),
  - c. The right to erasure of personal data under the circumstances provided for in Article 17 of the GDPR,
  - d. The right to restrict the processing of personal data in the cases indicated in Article 18 of the GDPR,
  - e. The right to data portability to another controller in the cases indicated in Article 20 of the of the GDPR,
  - f. The right to lodge a complaint with the President of the Office for Personal Data Protection if you consider that the processing of your personal data violates the provisions of the GDPR (UODO, Stanislawa Moniuszki 1A, 00-014 Warszawa, Poland),
  - g. To the extent that your data is processed on the basis of your consent (Article 6(1)(a) of the GDPR or Article 9(2)(a) of the GDPR) – you have the right to withdraw your consent to data processing at any time. The withdrawal of consent does not affect the lawfulness of the processing carried out on the basis of your consent prior to its withdrawal,
  - h. To the extent that your data is processed on the basis of a legitimate interest of the controller (Article 6 clause 1f of the GDPR) – you have the right to object, at any time, to the processing of your personal data.
8. Your personal data will not be transferred outside the European Economic Area or to the international organization.
9. You will not be subject to a decision that is based solely on automated processing, including profiling, and produces legal effects on you or similarly significantly affects you.

Prepared by:	<i>Izabela Kozłowska</i>	Date		Signature	
Approved:	<i>Management Board</i>				

 <b>Polenergia</b>	<b>POLENERGIA GROUP</b>	<b>No. P-P081</b>
<b>Date: 08.04.2025</b>	<b>PROCEDURE OF HOW TO PROCEED WITH REPORTS CONCERNING MOBBING, DISCRIMINATION, AND OTHER UNDESIRABLE BEHAVIOR(S) IN THE AREA OF EMPLOYEE RELATIONS IN THE POLENERGIA GROUP</b>	<b>COMPLIANCE</b>

#### APPENDIX NO. 4 - TEMPLATE OF CONFIDENTIALITY STATEMENT

##### CONFIDENTIALITY STATEMENT

I hereby declare that I undertake to keep confidential any information obtained during or in connection with the Report concerning Undesirable Behavior(s) (hereinafter: **Report**) in ..... (hereinafter: the **Company**) of ....., including, in particular, in relation to my participation in the explanatory proceeding of the Report.

I am aware that all information and data relating to the Report or the explanatory proceeding is of the utmost confidentiality and may constitute a business secret of the Company.

In addition, I undertake not to speak to any employees or associates of the Company or any third party about the matter relating to the Report, in particular the course of the explanatory proceeding, the issues raised therein, or any other circumstances which have become known to me in connection with the Report.

The confidentiality obligation is perpetual.

**NAME:** \_\_\_\_\_

**POSITION (IF APPLICABLE):** \_\_\_\_\_

**DATE:** \_\_\_\_\_

**SIGNATURE:** \_\_\_\_\_

Prepared by:	<i>Izabela Kozłowska</i>	Date		Signature	
Approved:	<i>Management Board</i>				