

HUMAN RIGHTS POLICY

Zakłady Metalowe „POSTĘP” S.A.



Gliwice, 29 January 2026

Zakłady Metalowe „POSTEP” S.A. conducts its business in a responsible manner, with respect for human rights, labour rights, human dignity, equal treatment, occupational health and safety, ethical principles and applicable laws.

The purpose of this Labour and Human Rights Policy is to define the Company’s principles, commitments, and qualitative and quantitative objectives related to ensuring decent and safe working conditions, preventing discrimination and harassment, protecting human rights, supporting employee development, promoting social dialogue, and building responsible relationships with stakeholders.

This Policy applies to all employees of Zakłady Metalowe „POSTEP” S.A., regardless of their position, type of work performed, working time or basis of employment. Where appropriate, the principles of this Policy also apply to persons cooperating with the Company, suppliers, subcontractors, customers and other business partners.

1. General Principles

Zakłady Metalowe „POSTEP” S.A. is committed to complying with applicable labour law, occupational health and safety requirements, human rights principles, ethical standards and internal regulations in force within the Company.

In particular, the Company is committed to:

- a) respecting the dignity, rights and freedoms of every individual,
- b) providing safe, lawful and decent working conditions,
- c) respecting labour rights,
- d) preventing discrimination, workplace bullying, harassment and unequal treatment,
- e) preventing child labour, forced labour, human trafficking and all forms of exploitation,
- f) providing employees with access to information concerning employment-related and organisational matters,
- g) supporting professional development and the improvement of employee qualifications,
- h) enabling employees to raise questions, submit suggestions, comments and report irregularities without fear of retaliation,
- i) respecting human rights in relationships with external stakeholders,
- j) conducting business in a fair, responsible and transparent manner.

2. Working Conditions, Employee Health and Safety

Zakłady Metalowe „POSTEP” S.A. considers the provision of safe and decent working conditions to be one of the fundamental responsibilities of the employer. The Company organises work in accordance with applicable laws, occupational health and safety requirements and internal regulations.

The Company aims to provide a working environment that promotes safety, cooperation, responsibility and respect for employee dignity.

Employees are required to comply with occupational health and safety regulations, use the required personal protective equipment, report hazards and inform their supervisors of any identified irregularities, accidents or events that may affect workplace safety.

3. Social Dialogue and Employee Communication

Zakłady Metalowe „POSTEP” S.A. maintains dialogue with employees and provides access to information concerning the organisation of work, employment-related matters, safety, organisational changes and other significant matters related to the Company’s operations.

Communication with employees takes place in particular through the intranet, notice boards, internal announcements, information communicated by supervisors, employee meetings, contact with the HR and Payroll Department, and communication with employee representatives.

The Company enables employees to raise questions, submit suggestions and comments, and report irregularities without fear of retaliation. Where consultation with employees is required, the Company uses the applicable employee representation mechanisms, including employee representatives elected in accordance with the relevant rules.

Zakłady Metalowe „POSTĘP” S.A. recognises social dialogue as an important element of responsible organisational management. The Company strives to ensure that employee communication is reliable, transparent, accessible and appropriate to the nature of the information being communicated.

4. Career Management, Competence Development and Training

Zakłady Metalowe „POSTĘP” S.A. supports the professional development of employees by enabling participation in training, improving professional qualifications, developing job-related competencies and providing the knowledge necessary to perform work correctly and safely.

The Company ensures equal access to professional development, training and promotion opportunities, taking into account qualifications, experience, competencies, work performance and organisational needs.

Training activities may be documented through training plans, training attendance records, competence matrices or other documents confirming the development of employee qualifications.

Zakłady Metalowe „POSTĘP” S.A. aims to build a culture of knowledge sharing, continuous learning and employee competence development in line with job requirements, organisational needs and the Company’s capabilities.

5. Prohibition of Child Labour, Forced Labour and Human Trafficking

Zakłady Metalowe „POSTĘP” S.A. does not tolerate child labour, forced labour, human trafficking, slavery, work performed under psychological or physical coercion, retention of employees’ personal documents, restriction of freedom of employment or any form of employee exploitation.

The Company complies with applicable labour law, including regulations concerning the minimum employment age, working time, remuneration, freedom of employment and the employee’s right to terminate the employment relationship in accordance with applicable laws.

Zakłady Metalowe „POSTĘP” S.A. does not permit any actions that could lead to the violation of an employee’s freedom, forced labour, threats, violence, blackmail, economic coercion or any other form of pressure.

The Company expects suppliers, subcontractors, temporary employment agencies and other business partners to comply with these principles as well. Where a risk of human rights violations is identified, the Company undertakes appropriate investigation and corrective actions in line with the nature of the relationship and the level of risk.

6. Equal Treatment and Prevention of Discrimination and Harassment

Zakłady Metalowe „POSTĘP” S.A. ensures equal treatment of employees and job applicants and does not tolerate discrimination, workplace bullying, harassment, sexual harassment, intimidation, humiliation, exclusion or any other behaviour violating human dignity.

The Company does not tolerate discrimination based in particular on sex, age, disability, race, nationality, ethnic origin, religion, belief, convictions, sexual orientation, marital status, family situation, trade union membership, form of employment, working time or any other characteristic protected by law.

The principle of equal treatment applies in particular to:

- a) recruitment and candidate selection,
- b) employment conditions,
- c) remuneration,
- d) access to training and professional development,
- e) promotions,
- f) performance evaluation,
- g) assignment of professional duties,
- h) termination of employment.

Every employee has the right to work in an environment free from discrimination, workplace bullying and harassment. Employees may report violations in accordance with the applicable internal procedures without fear of retaliation.

7. Human Rights of External Stakeholders

Zakłady Metalowe „POSTĘP” S.A. is committed to respecting human rights not only with regard to its own employees, but also in its relationships with external stakeholders, in particular suppliers, subcontractors, customers, employees of cooperating companies, the local community and other business partners.

The Company expects its business partners to comply with applicable laws, ethical principles, human rights standards, occupational health and safety requirements, the prohibition of discrimination, child labour, forced labour and human trafficking, and to respect the dignity of individuals who may be affected by their activities.

Zakłady Metalowe „POSTĘP” S.A. aims to build relationships with stakeholders in a responsible, fair and transparent manner, with respect for their rights, safety, privacy and legitimate expectations.

In its relationships with suppliers and business partners, the Company promotes responsible practices, in particular through the application of ethical principles, human rights requirements, workplace safety standards and responsible business conduct.

8. Reporting Violations and Protection Against Retaliation

Zakłady Metalowe „POSTĘP” S.A. enables the reporting of violations of law, ethical principles, human rights, equal treatment principles, workplace safety requirements and other irregularities in accordance with applicable internal regulations.

The Company does not tolerate retaliation against individuals who make reports in good faith. Each report should be reviewed with due regard to confidentiality, impartiality and respect for the rights of the persons concerned.

9. Qualitative and Quantitative Objectives in the Area of Labour and Human Rights

Zakłady Metalowe „POSTĘP” S.A. defines qualitative and quantitative objectives in the area of labour and human rights in order to monitor the effectiveness of its activities and improve practices related to responsible employee management and stakeholder relations.

Area	Qualitative Objective	Quantitative Objective / Measure
Working conditions	Ensure safe, lawful and decent working conditions	100% of employees familiarised with the Work Regulations, Remuneration Regulations, Code of Ethics and other applicable documents and occupational health and safety requirements
Employee health and safety	Reduce accident risk and build a strong safety culture	100% of new employees receive occupational health and safety training before being authorised to work
Social dialogue	Ensure employees have access to information and the opportunity to raise comments and concerns	Permanent communication channels in place: intranet, notices, supervisors, HR and employee representatives
Career management and training	Develop employee competencies in line with job-related and organisational needs	Implementation of the annual training plan and documentation of completed training
Child labour, forced labour and human trafficking	Zero tolerance for child labour, forced labour, human trafficking and all forms of exploitation	0 confirmed cases of violations
Discrimination and harassment	Ensure equal treatment and prevent workplace bullying, harassment and discrimination	100% of reports reviewed in accordance with applicable procedures
Human rights of external stakeholders	Respect human rights in relationships with suppliers, subcontractors, customers and the local community	Business partners covered by ethical requirements, e.g. through the Supplier Code of Conduct

Achievement of the above objectives is monitored in particular through the analysis of HR documentation, training records, occupational health and safety documentation, employee reports, documentation concerning employee representatives, supplier cooperation documentation and other available organisational data.

Monitoring results are documented in the relevant registers, reports, summaries or minutes applicable to the respective area.

10. Responsibility for Policy Implementation

The Management Board of Zakłady Metalowe „POSTEP” S.A. is responsible for establishing, approving and supervising the implementation of this Policy.

Management and persons supervising employees are responsible for implementing the principles arising from this Policy within their respective areas, promoting responsible conduct, responding to reported irregularities and supporting a working culture based on respect, safety and responsibility.

The HR and Payroll Department supports the implementation of the Policy in the areas of employee matters, employee communication, HR documentation, training, employment rules and other matters related to labour and human rights.

Employees are required to comply with the principles set out in this Policy, apply them in their daily work and report identified irregularities in accordance with applicable procedures.

11. Related Documents

The implementation of this Policy may be supported in particular by the following documents and internal regulations:

- a) Work Regulations,
- b) Code of Ethics,
- c) Supplier Code of Conduct,
- d) Rules for the Election of Employee Representatives,
- e) Training Plan or Competence Matrices,
- f) occupational health and safety procedures and instructions,
- g) Breach Reporting Procedure / Whistleblowing Procedure,
- h) other internal regulations relating to employment, workplace safety, ethics, communication and cooperation with business partners.

12. Monitoring and Continuous Improvement

Zakłady Metalowe „POSTĘP” S.A. monitors the implementation of the principles set out in this Policy and undertakes improvement actions where needs, risks, non-conformities or opportunities for process improvement are identified.

Monitoring includes in particular:

- a) analysis of working conditions and workplace safety,
- b) analysis of training implementation,
- c) analysis of reports concerning violations of labour rights, ethical principles, discrimination, workplace bullying, harassment or human rights,
- d) analysis of the effectiveness of employee communication channels,
- e) analysis of cooperation with suppliers and business partners,
- f) review of internal documents and their validity,
- g) identification and analysis of risks related to human rights, labour rights, equal treatment, workplace safety, child labour, forced labour and stakeholder relations.

Monitoring results are analysed at least once a year and documented in appropriate registers, reports, summaries, minutes or other documents relevant to the respective area.

The Company is committed to the continuous improvement of its activities in the area of labour and human rights, in accordance with applicable laws, stakeholder expectations, customer requirements, monitoring results and the Company's organisational capabilities.

13. Final Provisions

This Human Rights Policy applies to all employees of Zakłady Metalowe „POSTĘP” S.A. and, where appropriate, to persons cooperating with the Company and its business partners.

The Policy is reviewed **at least once a year** and whenever significant changes occur in applicable laws, organisational structure, customer requirements, stakeholder expectations, risk assessment results or where improvement of activities in the area of labour and human rights is required.

The Management Board of Zakłady Metalowe „POSTĘP” S.A. declares its commitment to the implementation of this Policy and ensures that its principles are communicated and applied at the appropriate levels of the organisation.

29.01.2026

WICEPREZES ZARZĄDU

Wojciech Szarek

PREZES ZARZĄDU

Piotr Rymer