

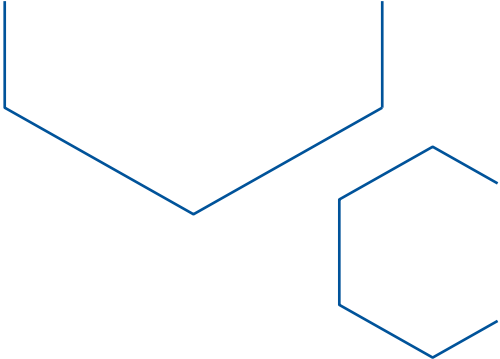


GROUP POLICY

Diversity & Inclusion, Non-Discrimination and Anti-Harassment Policy

Draslovka a.s.

Draslovka



Document Information

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Confidentiality Statement

This Policy shall not be disclosed or distributed outside Draslovka Group, unless for audit or other purposes required by law or regulation or upon written approval of the Group CEO or Group Head of Compliance.

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1 Purpose and Scope

1.1 Purpose

The Draslovka Code of Conduct establishes a shared set of values and standards to which all Employees are expected to adhere. It is designed to guide the actions of Employees and to provide the overarching principles to make the right decisions, even when it is hard to do so. The five fundamental Draslovka values – ***We constantly reimagine what is possible, We always do the right thing, We act like business owners, We put safety first, and We build strong relationships*** – shape the Draslovka culture as an inclusive and diverse multinational organization.

These Draslovka values have created an environment where everyone is treated equally and professionally, with dignity and respect, and where discrimination and harassment are not tolerated. Respect is the norm in the Draslovka workplace, regardless of personal feelings. Draslovka supports this wholly – not only because of the benefits it brings in terms of business innovation, productivity, talent retention, and overall competitive advantage and operational resilience, but simply because it is the right thing to do.

The quality of the Draslovka workplace affects the overall success of the company as an open and positive work atmosphere influences motivation and overall efforts. Draslovka fully supports diverse points of view, engages in thoughtful dialogue and creates an inclusive environment where everyone feels safe, respected and has an opportunity to personally contribute, make a difference and excel.

1.2 Scope and Implementation

This Policy is mandatory and applies to all Employees and all entities within Draslovka Group insofar as it does not contradict local legislation. The implementation of this Policy in Draslovka Group shall be proportionate and take into account size and internal organization of a Group Company and the nature, scale and complexity of its activities. It must also reflect country-specific risks and requirements of Applicable Non-Discrimination and Anti-Harassment Laws.

In line with Draslovka Group's commitment to ethical business conduct, this Policy applies even if the respective Group Company is not subject to any Applicable Non-Discrimination and Anti-Harassment Laws.

1.3 Related Documents

This Policy represents an integral part of Draslovka Group compliance framework mainly laid down by the Draslovka Code of Conduct. The Group Whistleblowing and Internal Investigation Guideline, as locally implemented, describes in more detail how to appropriately assess, assign, investigate and address compliance reports in accordance with Draslovka values and Draslovka Code of Conduct.

2 Roles and Responsibilities

This clause defines roles and responsibilities related to matters covered by this Policy.

Group level

2.1 Board of Directors of Draslovka a.s.:

- a) approves this Policy and ensures its regular review, at least annually,
- b) oversees implementation of this Policy, and
- c) reviews Group HR strategies submitted by the HR and Remuneration Committee.

2.2 HR and Remuneration Committee:

- a) develops and regularly updates Group HR strategies,
- b) reports on relevant HR matters to the Board of Directors of Draslovka a.s., and
- c) co-oversees implementation of this Policy.

2.3 Group Head of Human Resources:

- a) monitors and controls the implementation of this Policy in Group Companies and regularly considers its suitability, adequacy, and effectiveness,
- b) provides guidance to Managers and Employees in relation to creating an inclusive and diverse workforce,
- c) provides guidance to Employees in relation to any concern, suspicion, or uncertainty related to potential discrimination and/or harassment,
- d) monitors and manages allegations of violations of this Policy,
- e) assesses the extent to which Draslovka Group and/or a Group Company is diverse and inclusive by way of internal data analytics and suggests specific initiatives to enhance diversity and inclusion, and
- f) approves exceptions under this Policy.

Group Company level

2.4 Group Company Approving Body:

- a) approves local implementation of this Policy and ensures regular review of its implementation, at least annually, and
- b) has overall responsibility for ensuring that local implementation of this Policy complies with Group Company's legal obligations including Applicable Non-Discrimination and Anti-Harassment Laws.

2.5 Group Company Human Resources Manager/HR Business Partner:

- a) is responsible for the local implementation of this Policy in a Group Company,
- b) promotes an all-inclusive environment in all employment practices,
- c) keeps records (anonymized where necessary) of referrals related to this Policy, and
- d) ensures that allegations of discrimination and harassment are referred to the Group Company's Ethics Committee and investigated in accordance with the Group Company's Ethics Investigations Procedure.

3 Diversity, Equity and Inclusion Policy

Draslovka perceives diversity as a key enabler for boosting team's performance, efficiency and innovation and - in a wider sense - for the Group's sustainability and resilience. As a truly global company with presence in variety of territories, diversity, equity and inclusion is a natural part of Draslovka culture and values. Applying principles of diversity, equity and inclusion means that all Employees feel they all belong to Draslovka Group and are respected and recognized.

Draslovka understands and appreciates that a wide range of backgrounds and experience add value to the business and is committed to an equal opportunities and equal access approach being part of a respectful workplace. Recognition is given that differences of opinions and

disagreements are necessary and valuable part of business discussions, scientific and technical explorations, and negotiations at all levels. This Policy does not prohibit these conversations, so long as they are conducted in a respectful manner.

All Employees must treat others with dignity and respect and day-to-day behavior must create an environment in which a diverse workplace is leveraged, cultural tolerance is promoted, and people are understood and empowered to realize their full potential.

Draslovka's Human Resources policies and practices will support diversity, equity and inclusion and these principles will be reflected in the approach to recruitment and selection, management of remuneration and benefits, opportunities for professional development and training, opportunities for promotions or transfers, participation in social and recreational programs, and selection criteria to be applied in cases of lay-offs and terminations.

Draslovka will encourage and enforce behavior that reflects diversity and inclusion during work as well as during work engagements (on or off site), including company sponsored events. Leveraging a diverse and inclusive workplace requires everyday behavior that must reflect the following as a minimum:

- respect in the way Employees communicate and consider alternative viewpoints and opinions,
- avoidance of communicating in a language that will exclude co-workers' understanding of conversations and discussions, either verbal or written,
- fostering diversity in teams, encouraging participation of all team members and respect for varying perspectives and opinions,
- flexibility in work schedules to accommodate varying needs of Employees, while considering business operations needs and applicable laws, and
- reasonable workplace accommodations to improve accessibility for people with disabilities.

4 Non-Discrimination Policy

Discrimination may have many forms and can be either direct or indirect. Direct discrimination occurs when an individual is treated less favorably by comparison to how others, who are in a similar situation, have been or would be treated, and the reason for this is a particular characteristic held. Indirect discrimination occurs when an apparently neutral rule disadvantages a person or a group sharing the same characteristics.

Draslovka does not discriminate, directly or indirectly, on the basis of age, gender, race, skin color, religion or belief, national, ethnic or social origin, sexual orientation, gender identity or expression, marital status, disability, political affiliation, union membership or any other characteristic protected by applicable laws, with respect to any terms or condition of employment, including hiring, promotion, demotion, transfer, recruitment, termination, rates of pay or other forms of compensation or benefits, and selection for training.

Work-related decisions are based on skills and abilities, not on characteristics that are improper to consider.

Regions and countries may have additional grounds for non-discrimination. Each Group Company must at all times respect Applicable Non-Discrimination and Anti-Harassment Laws.

5 Anti-Harassment Policy

Harassment can be defined as a conduct that is unwelcome or should reasonably be known to be unwelcome, to the person towards whom it is addressed. Harassment occurs when one or more Employees are deliberately abused, threatened and/or humiliated in circumstances relating to work. Harassment may be carried out by one or more Employees, with the purpose or effect of violating the Employees' dignity, affecting health and/or creating a hostile work environment.

Draslovka does not tolerate harassment of any kind. Harassment, including sexual harassment, may create a work environment in which an Employee can feel intimidated or offended, which is against Draslovka values.

Harassment may have many different forms and includes derogatory remarks or comments, any unwelcome, hostile, or offensive conduct, personal insults, expressions of intolerance, offers of job benefits in exchange for favors of sexual nature, and other forms of offensive behavior. It is prohibited by this Policy and Draslovka will not tolerate:

- bullying, slurs, derogatory or disrespectful remarks, spreading rumors and slander,
- expressing or insinuating threats, threatening assault,
- offensive physical contact such as hitting, punching, other unwanted touching, grabbing, pinching, or brushing against another's body,
- conduct where submission to sexual harassment is either an explicit or implicit condition of employment or where submission to, or rejection of, sexual harassment is used as the basis for employment decisions affecting the person involved,
- sexual advances and pressure, requests for sexual favors or verbal abuse of a sexual nature,
- offensive visual conduct, including leering, making sexual gestures, the display of offensive sexually suggestive objects or pictures, cartoons or posters,
- making offensive sexual jokes or comments, offensively suggestive or obscene letters, notes or invitations,
- graphic or degrading comments about an individual's appearance, or
- display or circulation of materials or pictures degrading to an individual or gender group.

This Policy forbids any harassment regardless of whether it rises to the level of a legal violation. Any unwelcome conduct based on gender is forbidden by this Policy regardless of whether the individual engaged in harassment and the individual being harassed are of the same or are of different genders.

6 Managers' and Employees obligations

6.1 Managers

Every Manager including Group and Group Company top Managers are expected to adhere and support the principles, rules and requirements set out in the Policy and, in particular to:

- (i) ensure that the work area for which they are responsible is inclusive, free of any discrimination and harassment, and for taking measures to address and eliminate any form of discrimination and harassment that will undermine the objectives of this Policy,
- (ii) lead by example and promote high ethical standards and Draslovka values in everyday actions,

- (iii) treat all Employees and other partners with professionalism, fairly and with respect,
- (iv) at all times comply with all provisions of this Policy, as well as with all Applicable Non-Discrimination and Anti-Harassment Laws as such laws might impose additional obligations or specific restrictions regulating the employee/employer relationship,
- (v) ensure that reported allegations of violations of this Policy are investigated and addressed promptly,
- (vi) not retaliate against any Employee who has complained or reported violations of this Policy, including complaints of harassment or discrimination, or who has given information in connection with such report, and
- (vii) be open for constructive discussion and any Employee's concern without fear of retaliation.

6.2 Employees

All Employees are responsible for embracing inclusion, diversity, non-discrimination, no harassment and, in particular to:

- (i) foster an environment where everyone can participate in the workplace without fear or intimidation,
- (ii) at all times comply with all provisions of this Policy and avoid any activity that might lead to, or suggest, a breach of this Policy or Applicable Non-Discrimination Laws,
- (iii) report any incidents contrary to this Policy, and
- (iv) not victimize any Employee and/or person who has complained or reported violations of this Policy.

6.3 Training

6.3.1 Managers and Employees in Human Resources

Each Employee involved in the supervision of staff, managing Employees' performance, hiring of new Employees, deciding on promotions and training opportunities should be regularly trained to gain an overview of the issues associated with diversity, equity, inclusion, discrimination and harassment.

In addition, Group Company's Human Resources Manager / HR Business Partner shall designate Employees that need to undergo specific training (including Group Company's Human Resources / HR Business Partner him/her-self).

6.3.2 Employees

Group Company might require all or specified Employees to complete specific training and/or certification (one-off or annual) on diversity, inclusion, non-discrimination and antiharassment.

7 Speaking Up and Non-Retaliation

7.1 Seeking Guidance and Speaking Up

If an Employee has any query or doubt as to potential breach of this Policy or Applicable Non-Discrimination and Anti-Harassment Law, or any question related to this Policy, he/she should seek further guidance. Similarly, every Employee who suspects that violations of law or of this Policy may be occurring or are about to occur, or becomes aware of conduct that is not inclusive, discriminatory or is of a harassing nature, is required to report it.

Employee's Human Resources Manager/ HR Business Partner is usually the first and best resource, since this person is familiar with this Policy and the individual's roles and duties. The following resources are also available:

- Management of a business unit, department or workplace of Employee
- Compliance, Legal, HR or Finance department
- Ethics confidential mailbox ethics@draslovka.com
- [Draslovka Group Ethics Hotline](#)

Employees are encouraged to include dates, times, location, details of the incident(s), names of the individuals involved and the names of witnesses to the incident(s) when making reports to allow for an expeditious investigation.

7.2 Resolution and Corrective Action

All reports describing conduct that is inconsistent with this Policy will be regarded as serious and will be investigated promptly, and in a manner that is expeditious and free of retaliation. To the extent permissible by applicable law, reports and information obtained in the investigation of the reports will be kept confidential.

Employees that are adversely affected by transgressions of the Policy will be offered assistance in the form of counselling and/or referrals to existing Employee assistance programs, on top of remedial actions required by circumstances of the particular case and adequate in location conditions.

The Group Company will take corrective action if an investigation confirms that a violation of this Policy or other inappropriate conduct has occurred. Corrective action may include disciplinary measures up to and including termination of employment, as appropriate under the circumstances, regardless of the job positions of the parties involved.

7.3 Non-Retaliation

Draslovka will not permit any retaliation or intimidation against anyone who, acting honestly and in good faith, raises a concern, reports suspected conduct that is not inclusive or that is discriminatory or of a harassing nature, or provides information in connection with an investigation of suspected conduct that is in violation of this Policy. All instances of potential retaliation will be investigated, and Employees who have retaliated against the person who has reported suspected misconduct will be disciplined.

It is prohibited to threaten or retaliate against Employee who has refused to take part in a breach of this Policy or who has raised concerns under this Policy. Such retaliations might include dismissal, disciplinary action, threats, or other unfavorable treatment connected with raising a concern. If Employee believes that he/she suffered threatening or retaliation, the Employee should report it to Group Head of Human Resources or use any of reporting channels listed in Clause 7.1, including Draslovka Group Ethics Hotline.

7.4 Data Collection, Root Cause Analysis and Risk Assessment

Group Head of Human Resources and Group Company Human Resources Manager/ HR Business Partner will be responsible for monitoring the successful implementation and application of the processes and practices relating to this Policy. The implementation shall be based on regular engagement with employees, the collection of data (anonymized where required) on reports or allegations made, the resolution thereof, corrective action taken and root cause analysis to identify risk factors on the Group or Group Company level. Other input to risk assessment, such as employee statistics shall be defined by Group Head of Human Resources.

8 Reporting

8.1 HR and Remuneration Committee

The HR and Remuneration Committee of Draslovka a.s. shall develop and regularly update Group HR strategies, including Group diversity and inclusion strategy. Such HR strategies shall be submitted for review of the Board of Directors of Draslovka a.s., in order to, among others, set and monitor diversity metrics and targets, agree on specific initiatives and promote Group Environmental, Social and Governance strategy.

The HR and Remuneration Committee shall, in line with its Terms of Reference, ensure that relevant data are collected and reported as required by applicable regulation.

8.2 Group Head of Human Resources

The Group Head of Human Resources shall report (as often as relevant or necessary):

- (i) data regarding diversity and inclusion in the Group to the HR and Remuneration Committee, and
- (ii) a summary of (de-identified) reports on violations of this Policy, including related follow-up actions to the Board of Directors of Draslovka a.s.

8.3 Group Company Human Resources Manager/HR Business Partner

Where a particular obligation, including reporting obligation, related to matters covered by this Policy arises solely from the local law, the Group Company Human Resources Manager/ HR Business Partner shall ensure that the Group Company complies with such local requirement and, if required by applicable law, shall report the relevant data, either individually or as a part of broader report. External reporting shall be coordinated with the Group Head of Human Resources and Group Head of Compliance.

9 Compliance Control

9.1 Group Company Internal Control

Group Company shall conduct periodic controls or audits of its relevant units to help ensure compliance with this Policy and Applicable Non-Discrimination and Anti-Harassment Laws.

9.2 Group Compliance & HR Control

Group Compliance Department, together with Group Head of Human Resources, may conduct control/audit focused, without limitations, on:

- a) compliance with this Policy,
- b) awareness and training management, and
- c) effectiveness of reporting system.

Employees shall fully cooperate during such controls or audits and promptly provide all requested information, documents and records. Unless required otherwise, result of each control or audit shall be recorded in a protocol signed by responsible Manager. Material findings shall be escalated to Business Unit CEO or Group CEO, as appropriate.

10 Local Implementation

10.1 Local Implementation of the Policy

Group Company is required to implement this Policy into local internal documents by approval of its Approving Body. Group Company is obliged to follow the full scope application of this Policy unless exception was approved under clause 10.2.

Group Company may apply additional or stricter rules at local level, either deriving from Applicable Non-Discrimination and Anti-Harassment Laws, or voluntarily.

10.2 Exceptions

Group Company Human Resources Manager/ HR Business Partner (or other responsible person, as applicable) has, after consultation with Group Head of Compliance, the right to ask Group Head of Human Resources for exceptions from this Policy only if this exception is necessary to meet the local regulatory requirements.

All exceptions approved under this Policy shall be always in line with Applicable Non-Discrimination and Anti-Harassment Laws, shall be documented by Group Head of Human Resources and must be available upon request. Form of Exceptions Evidence is attached below.



GP_Exceptions
Evidence.xlsx

11 Final Provisions

11.1 Assumption

This Policy applies insofar as it does not contradict local legislation. If implementation of some rules under this Policy is not permitted under local legislation, Group Company shall proceed according to clause 10.2.

11.2 Definitions

The meaning of capitalized terms used in this Policy is set out in Annex 1.

11.3 Owner

Owner of this Policy is Group Head of Human Resources.

11.4 Implementation

This Policy was issued on 3 August 2023 and shall be effective from 1 November 2023 (i.e., this is the target date from which the Policy shall be locally implemented and followed in Group Companies).

11.5 Amendments

This Policy does not form part of Employee's contract of employment and may be amended at any time.

Annex 1

Definitions

In this Policy:

“Applicable Non-Discrimination and Anti-Harassment Laws” means any applicable law or regulation addressing diversity, equity, inclusion, discrimination and/or harassment applicable to Employees, Group Company and/or the Group, as well as any international convention.

“Approving Body” means a body entitled to and responsible for approval and implementation of this Policy based on Group Company’s corporate processes, including but not limited to Board of Directors.

“Draslovka a.s.” means Draslovka a.s., with its registered office at Generála Píky 430/26, Dejvice, 160 00 Prague 6, Czech Republic, identification number 11786728, registered in Commercial Registry maintained by Municipal court of Prague, under file B, section 26599.

“Draslovka Group” or **“Group”** or **“Draslovka”** means all Group Companies; when this term is used in connection with specific position/function it refers to managers/officers/functions with specific “Group-wide” responsibility, reporting (directly or indirectly) to Group CEO.

“Group Company” means Draslovka a.s. and any entity controlled by Draslovka a.s. by means of direct or indirect majority participation or a control agreement respectively.

“Group Company Human Resources Manager / HR Business Partner” means Human Resources Manager responsible for human resources matters for a Group Company and/or business unit.

“Group Compliance Department” means organization unit managed by Group Head of Compliance; in case there is no other staff in Group Compliance Department than Group Head of Compliance, Group Compliance Department shall refer to Group Head of Compliance.

“Employee(s)” means each person working at any level of the Group or a Group Company, including, without limitations, all full-time and part-time employees, family members, members of a Group Company's board of directors or supervisory board, officers, directors, senior managers, consultants, contractors or any other third parties acting on behalf of the Group or a Group Company.

“HR and Remuneration Committee” mean HR and Remuneration Committee of Draslovka a.s.

“Manager” means a person that is entitled to define and impose on subordinate Employee(s) working tasks and binding instructions and organize, manage, and supervise their work.

“Owner” means function/department responsible for administration of this Policy or its amendment (draft, coordination, approval process, waivers and exceptions).

“Terms of Reference” means terms of reference of HR and Remuneration Committee, as amended from time to time.

“Policy” means this Group Diversity & Inclusion, Non-Discrimination and Anti-Harassment Policy.