

## HUMAN RIGHTS AND ANTIDISCRIMINATION POLICY

### I. Definitions:

- a. **Company** - ROBYG S.A. with the registered seat in Warsaw (Al. Rzeczypospolitej 1, 02-972 Warsaw), entered into the register of entrepreneurs maintained by the District Court for the Capital City of Warsaw in Warsaw, 13<sup>th</sup> Trade Division of the National Court Register under number KRS 0000280398, tax identification number NIP 525-23-92-367, statistical number REGON 140900353, initial capital: PLN 28,940,119.90 (contributed in full),
- b. **Group Company** - company affiliated with ROBYG S.A. in terms of capital,
- c. **ROBYG Capital Group** - the Company and Group Companies,
- d. **Personnel** - an employee or individual collaborating with ROBYG Capital Group,
- e. **Employee** - an individual employed at ROBYG Capital Group pursuant to an employment contract,
- f. **Regular Collaborator** - an individual providing services to ROBYG Capital Group on the basis of a civil law contract, including under a sole proprietorship carried out on a permanent basis,
- g. **Contractor** - a natural person, legal person or an organisational unit without legal personality that has entered into a contract with a company of ROBYG Capital Group, that has submitted a quotation to a ROBYG Capital Group company or has received a request for proposal from a ROBYG Capital Group company, or that is negotiating with a ROBYG Capital Group company with a view to conclude a contract or is seeking to enter into a business relationship with a ROBYG Capital Group company,
- h. **Compliance Officer** - an individual appointed by the Management Board of the Company to supervise fulfilment with the Compliance Policy,
- i. **Management Board** - members of the Management Board and proxies of the Company or Group Companies.

### II. Introduction:

ROBYG Capital Group has been changing Polish architecture for years, setting trends in the housing industry. The many years of experience in selling flats and creating living space allow it to optimally adapt the estates we build to the needs of the modern consumer.

ROBYG Capital Group actively invests in four major agglomerations: Warsaw, Gdansk, Wroclaw and Poznan. ROBYG Capital Group is active in the development industry and is engaged in the construction and sale of residential properties. All companies forming ROBYG Capital Group have their registered seats and conduct business activity in Poland.

Respect for human rights is one of the pillars of daily functioning of ROBYG Capital Group. It lies both at the core of relations within ROBYG Capital Group itself and with our Stakeholders. It implies treating people equally, acting transparently, valuing people for what they do and who they are, regardless of their position, seniority, age, gender, health, family status, ethnicity and gender identity, orientation, beliefs or nationality.

### III. Objectives:

This document sets out the standards to be adhered to by ROBYG Capital Group Personnel both at and outside the workplace, including in social media.

ROBYG Capital Group further expects the provisions of the Policy to be adhered to by Contractors working with ROBYG Capital Group companies. ROBYG Capital Group shall also promote the obligations under the Policy among Contractors.

ROBYG Capital Group is committed to respecting international human rights principles and international labour standards. ROBYG Capital Group is committed to upholding the provisions of the United Nations Universal Declaration of Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

The Human Rights and Antidiscrimination Policy complements and consolidates the human rights aspects

# ROBYG

included in other ROBYG Capital Group policies, procedures and guidelines such as Codes, Occupational Health and Safety Regulations or HR policies.

ROBYG Capital Group adopts core values and objectives in relation to promoting diversity and preventing discrimination:

- We respect human dignity and are committed to protecting and respecting human rights. Every Employee and Regular Collaborator of the Company or Group Companies shall ensure that these rights are respected.
- All Employees and Regular Collaborators are committed to taking firm action towards any discrimination against colleagues, customers and business partners on the basis of race or ethnicity, gender, religion or belief, disability, age, or sexual identity.
- Courtesy and respect shall be shown in daily dealings with customers and Contractors and during cooperation between all Employees and Regular Collaborators. Open communication within the entire ROBYG Group is essential. Employees and Regular Collaborators are also expected to support and help each other, regardless of position, departmental affiliation and responsibilities.
- The Management Board shall not tolerate any violation of the above rights and principles and shall take firm action in response to their violation and attempts of mobbing among the Personnel.

These guidelines are intended to detail the core values and objectives and to regulate responsibilities.

## **IV. Scope and legal basis:**

These guidelines shall apply throughout ROBYG Capital Group, towards all Employees, Regular Collaborators and bodies of ROBYG S.A. and its subsidiaries. They are based collectively on four equal treatment directives issued by the Council of the European Union between 2000 and 2004, which were transposed into the Polish law by the Act on the implementation of certain regulations of the European Union on equal treatment of 3 December 2010. In detail, these were the following directives:

- Council Directive 2000/43/EC of 29 June 2000 implementing the principle of equal treatment between persons irrespective of racial or ethnic origin;
- Council Directive 2000/78/EC of 27 November 2000 establishing a general framework for equal treatment in employment and occupation;
- Directive 2006/54/EC of the European Parliament and of the Council of 5 July 2006 on the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation; and
- Council Directive 2004/113/EC of 13 December 2004 implementing the principle of equal treatment between men and women in the access to and supply of goods and services.

The standards contained in Convention No. III of the International Labour Organisation - concerning discrimination in respect of employment and occupation, ratified in Poland on 30 May 1961 shall also be complied with. Where Polish regulations or laws are in force that are more restrictive than these guidelines, then those regulations shall take precedence.

## **V. Respect for terms and conditions of employment:**

ROBYG Capital Group complies with all regulations on terms and conditions of employment, including regulations on basic working hours and overtime work. ROBYG Capital Group shall use its best endeavours to enable all employees to exercise their rights to sick leave and annual leave, parental leave for the care of new born children of their own or adopted children, in accordance with the form of employment adopted, and shall comply with the arrangements made with Employees' representatives.

## **VI. Employment of children and forced labour:**

ROBYG Capital Group prohibits the employment of children and underage persons. ROBYG Capital Group shall not offer employment to minors under the age of 15 and prohibits any form of forced or compulsory labour. We are opposed to all forms of modern slavery, both within ROBYG Capital Group and among cooperating entities.

## **VII. Promoting occupational health and safety:**

We do our best to provide our Employees and Regular Collaborators with a healthy and safe workplace that complies with applicable occupational health and safety regulations. We believe that this will make work at ROBYG Capital Group both productive and safe. We take measures aimed at minimising the risk of accidents at work by introducing a number of procedures, as well as by providing Employees and Regular Collaborators with the necessary safety equipment and ensuring that it is used correctly.

## **VIII. Promotion of equal opportunities and diversity:**

At ROBYG Capital Group, all Employees and Regular Collaborators have equal opportunities, regardless of their background, gender, age or physical disability. The diversity of viewpoints, experiences, cultures, ways of thinking and approaches resulting from the environment and background of our Employees and Regular Collaborators is very important to us. We are convinced that sustainable success in business can only be achieved through diversity. Lack of diversity deprives one of important skills and experiences, whether in dealing with colleagues, clients or Contractors.

With this in mind, it is important to ensure a diverse composition (in terms of gender, age, etc.) in key projects and decision making bodies. This applies in particular to staff recruitment and development. The diversity aspect can also play an important role in dealing with customers and Contractors, e.g. when language skills are crucial. With regard to diversity, particular attention shall be paid to ensuring that women are adequately represented on management positions within ROBYG Capital Group. ROBYG Capital Group shall take due care to ensure that there is adequate representation of women at management and supervisory levels.

## **IX. No tolerance for discrimination and legal consequences of discrimination:**

Taking into account the principles described in par. II and III, no forms of discrimination against Employees, Regular Collaborators, customers and Contractors, as well as other persons shall be tolerated within ROBYG Capital Group, including in particular:

### 1. Discrimination and harassment related to:

- race or ethnicity,
- gender,
- religion or beliefs,
- disability,
- age,
- sexual identity.

This shall also include attempts to intimidate, show hostility, insults, derogatory remarks and use of inappropriate websites.

### 2. Stalking and bullying, i.e. following people or being hostile towards them and bullying them.

Any determined or suspected violations shall be reported by all Employees and Regular Collaborators - directly to the Compliance Officer or through the whistleblowing channels described in the Whistleblowing Procedure.

Should the Management Board become aware of a material breach of these guidelines by an Employee or Regular Collaborator, the Management Board may request the Compliance Officer to issue an opinion from a legal and compliance perspective. Based on this opinion, a decision shall be made as to whether disciplinary or employment law action should be taken with respect to Employees, or other liability, including damages paid by Regular Collaborators.

## **X. Scope of responsibility:**

ROBYG Capital Group declares that individuals who are victims or witnesses of non-compliance with the principles set out in this Policy may report a complaint on a confidential basis using the whistleblowing procedure

# ROBYG

adopted by ROBYG Capital Group, e.g. by reporting to the following email address: [zgloszenia.naruszen@robyg.com.pl](mailto:zgloszenia.naruszen@robyg.com.pl) or anonymously via the website form: [www.opinie.robyg.pl](http://www.opinie.robyg.pl). Information on violations shall be treated with utmost confidentiality. In accordance with the Whistleblowing Procedure, reports shall only be disclosed to employees or third parties where there is a need to do so due to an ongoing investigation.

ROBYG Capital Group periodically reviews its labour law and human rights policies and guidelines to ensure their relevance and suitability to our business. The most recent version shall apply in all cases.

If in doubt regarding these guidelines, the Compliance Officer should be contacted. The Compliance Officer shall conduct an investigation in cooperation with the Legal Section and/or the HR/PR Section, and any violations of these guidelines shall be reported directly to the Company's Management Board.

In the event of serious violations, the Management Board shall report such violations to the Company's Supervisory Board and include them in the quarterly Compliance Report.

## **XI. Implementation and entry into effect:**

ROBYG Capital Group companies shall implement this Policy in their daily operations. All ROBYG Capital Group companies shall take appropriate measures to communicate the provisions of this Policy to employees in their native language.

Contractors of ROBYG Capital Group shall familiarise themselves with this Policy and make every effort to respect its provisions.

This regulation shall be effective as of 26.01.2023.

The latest applicable version is published on the intranet.

Employees and Regular Collaborators shall receive regular training on antidiscrimination measures and regulations.

## SOCIAL POLICY

### I. Definitions:

- a. **Company** - ROBYG S.A. with the registered seat in Warsaw (Al. Rzeczypospolitej 1,02-972 Warsaw), entered into the register of entrepreneurs maintained by the District Court for the Capital City of Warsaw in Warsaw, 13<sup>th</sup> Trade Division of the National Court Register under number KRS 0000280398, tax identification number NIP 525-23-92-367, statistical number REGON 140900353, initial capital: PLN 28,940,119.90 (contributed in full),
- b. **Group Company** - company affiliated with ROBYG S.A. in terms of capital,
- c. **ROBYG Capital Group** - Company and Group Companies,
- d. **Personnel** - an employee or individual collaborating with ROBYG Capital Group,
- e. **Employee** - an individual employed at ROBYG Capital Group pursuant to an employment contract,
- f. **Regular Collaborator** - an individual providing services to ROBYG Capital Group on the basis of a civil law contract, including under a sole proprietorship carried out on a permanent basis,
- g. **Contractor** - a natural person, legal person or an organisational unit without legal personality that has entered into a contract with a company of ROBYG Capital Group, that has submitted a quotation to a ROBYG Capital Group company or has received a request for proposal from a ROBYG Capital Group company, or that is negotiating with a ROBYG Capital Group company with a view to conclude a contract or is seeking to enter into a business relationship with a ROBYG Capital Group company,
- h. **Management Board** - members of the Management Board and proxies of the Company or a Group Company,
- i. **Supervisory Board** - supervisory board of the Company.

### II. Principles of social involvement of ROBYG Capital Group:

To us, the economic objective of ROBYG Capital Group - sustainable growth in corporate value - is not a purely economic task, but is equally linked with social and environmental responsibility. It is, therefore, in our personal interest and in the interest of our stakeholders to actively contribute to continued development of liveable neighbourhoods and to offer special forms of assistance and support to local communities and, in the future, to special groups of tenants.

ROBYG Capital Group offers flats for sale. Social commitment and socially responsible behaviour are the foundations of our long-term growth. We are responsible to our Contractors, as well as customers, tenants, Personnel, suppliers and investors.

We work with our regional and local partners to create attractive portfolios and residential neighbourhoods that our customers enjoy living in. The principles of cooperation in the spirit of partnership are based on the principles implemented in the Business Partner Code of Conduct.

The Management Board of ROBYG S.A. bears primary responsibility for our social commitment. In addition, all ROBYG Capital Group Personnel have the opportunity to make suggestions and ideas regarding practical implementation of the above principles in projects undertaken by ROBYG Capital Group.

At least once a year, the Management Board of the Company shall review the existing social commitment objectives. The Supervisory Board shall review these objectives and the extent to which they have been achieved as part of the annual Sustainable Development Report.

### III. Specific measures and guidelines:

#### 1. Principle of regionality:

The principle of regionality, combining proximity to tenants, embedding of Employees and Regular Collaborators at a particular location with local social and cultural engagement, is an integral part of ROBYG Group's strategy.

Through our core principle of dual local presence, i.e. Employees and Regular Collaborators from the region who work for the region, and a directly accessible service for our customers and tenants, we lay the foundations for

# ROBYG

effective action as a local protagonist in the social sphere. The education and further training of young people is our declared objective.

## 2. Liveable neighbourhoods:

In order to make our buyers feel at home in our flats, we constantly analyse our portfolios and then make targeted adjustments to current needs, take responsibility for designing the living environment and work to create a good neighbourhood.

We aim to reflect the diversity of our housing tenants in our community activities. We place particular emphasis on promoting and supporting:

- children;
- adolescents;
- young families.

The support we provide to this end is varied in nature and can be provided through:

- direct donations to charitable organisations and associations,
- joint press and public relations activities,
- support for local communities.

We work closely with local authorities, not-for-profit and community organisations and other local offices to implement regeneration measures in neighbourhoods. In addition, we actively improve the living conditions of our tenants by providing a variety of additional services, which we are continuously expanding.

## 3. Reliable partner:

ROBYG Capital Group sees itself as a civic enterprise in its locations and, therefore, actively participates in public life. In conjunction with our economic performance, we also bear responsibility for developing public life. That is why, in cooperation with partners, we initiate social and cultural projects to strengthen or (re)build social structures.

We actively support urban development and redevelopment projects and, in this regard, are in close contact with local authorities, other owners and other stakeholders.

## **IV. Entry into force and publication:**

This regulation shall be effective as of 26.01.2023.

The latest applicable version shall be available on the intranet.