

**POLICY ON COUNTERACTING BULLYING, DISCRIMINATION  
AND SEXUAL HARASSMENT**  
**in**  
**VBC Europe sp. z o.o.**

Approved by:

**The Management Board of VBC Europe sp. z o.o.**

Topole, 17/03/2025

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## Chapter I

### GENERAL PROVISIONS

#### §1

##### Basis for implementation of the Policy

1. This Policy on Counteracting Bullying, Discrimination and Sexual Harassment (hereinafter referred to as the '**Policy**') establishes and specifies in detail the rules for counteracting bullying, discrimination and sexual harassment at VBC Europe sp. z o.o. with its registered office in Topole (hereinafter: the '**Company**' or '**Employer**') and applies to the Company's employees and associates, regardless of the legal basis for such partnership.
2. A person making a report in matters covered by this Policy is not entitled to the protection due to a whistleblower within the meaning of the Act of 14 June 2024 on the protection of whistleblowers (Journal of Laws of 2024, item 928, as amended), and the Procedure for reporting violations of law and follow-up activities in force at VBC Europe sp. z o.o. does not apply to reports made.

#### §2

##### Employee's obligation to read the Policy

1. All employees and associates of the Company are required to read the Policy.
2. The Policy is communicated to employees by displaying it in a place accessible to all employees in the workplace for a period of one month.
3. The Policy is continuously posted on SharePoint and available for inspection in the Company's HR department.

#### §3

##### Definitions

Whenever the Policy refers to:

1. **Policy** – this document, including future changes, describing the Company's rules on counteracting bullying, discrimination and sexual harassment (including sexual abuse);
2. **bullying** - understood to mean actions or behaviour relating to or directed against an employee, consisting of persistent and long-term harassment or intimidation of an employee, causing the employee to have an inferior opinion of their professional suitability, causing or aiming to humiliate or ridicule the employee, isolating them or excluding them from a team of co-workers;
3. **discrimination** - understood to mean unequal treatment in terms of the establishment or termination of an employment relationship, conditions of employment, promotion and access to training in order to improve professional qualifications, in particular on the basis of gender, age, disability, race, religion, nationality, political beliefs, union membership, ethnic origin, faith, sexual orientation, as well as due to employment for a definite or indefinite period or full-time or part-time work, both in the form of direct and indirect discrimination, including:
  - a) undesirable behaviour aimed at or resulting in violation of the employee's dignity and creating an intimidating, hostile, degrading, humiliating or offensive atmosphere (harassment);
  - b) encouraging or instructing another person to violate the principle of equal treatment in employment (the rule of non-discrimination).
4. **sexual harassment** - understood to mean discrimination based on gender, i.e. any undesirable behaviour of a sexual nature or relating to the gender of an employee, the objective or effect of which is a violation of the employee's dignity, in particular the creation of an intimidating, hostile, degrading, humiliating or derogatory atmosphere towards them, which may consist of physical, verbal or non-verbal elements, including indecent behaviour, unwanted conduct of a sexual nature by a supervisor or another employee, including demands or

requests for sexual favours or other verbal or non-verbal conduct of a sexual nature, including when opposition to such behaviour by the employee to whom such behaviour is directed affects or may affect (also implicitly, by creating an appropriate atmosphere) decisions regarding the employee's promotion, changes in working conditions or pay, remuneration, scope of duties, referral to training, work assessment, extension or termination of the employment relationship;

5. **undesirable behaviour** or **undesirable behaviours** – understood to mean behaviour or behaviours that constitute bullying or discrimination or sexual harassment, including mixed behaviours that fulfil the criteria of more than one category of undesirable actions, e.g. bullying combined with sexual harassment;
6. **Employer or Company** - shall mean VBC Europe sp. z o.o. with its registered office in Topole;
7. **employee** - this refers to a person who has an employment relationship with the Employer and a person who works with or provides services to the Company on a different legal basis, i.e. on the basis of a civil law contract (e.g. on the basis of a contract of mandate or a managerial contract) or appointment;
8. **Commission** - this is understood to be the group of people referred to in § 8 of the Policy, appointed by the Employer to conduct proceedings caused by the report of an undesirable action or undesirable actions;
9. **Party to the proceedings** – understood to mean a person who claims to have been subjected to bullying, discrimination or sexual harassment (also referred to as: **the victim**) or a person indicated as the perpetrator or co-perpetrator of bullying, discrimination or sexual harassment, who are participants in the proceedings before the Commission;
10. **VBC US** – understood to mean the parent company of the Company, i.e. the entity holding 100% of the shares in the Company's share capital;
11. **Report or report** – understood to mean a report concerning an undesirable action or undesirable actions, as referred to in § 7, section 1 of the Policy;
12. **Platform** – an encrypted SYGNANET IT system used to make Reports via an online form available at <https://app.sygnanet.pl/vbceurope/pl> and allowing communication with the employee making the report.

## Chapter II

### POLICY OBJECTIVES

#### §4

##### **The main objectives of the Policy, the obligation of employees to cooperate**

1. The priority objective of the Policy is to prevent and counteract negative phenomena of undesirable actions and to support activities conducive to building good relations between employees.
2. Employees are obliged to respect the dignity and personal rights of all participants in the work process.
3. Employees are obliged not to engage in undesirable behaviour (i.e. behaviour that constitutes bullying, discrimination or sexual harassment) and to oppose (not tolerate) its use by others.

## Chapter III

### RIGHTS AND OBLIGATIONS OF THE EMPLOYER AND THE EMPLOYEES. RESPONSIBILITY:

#### §5

##### **Employees' rights, employers' obligations**

1. An employee who is subjected to behaviour that is considered undesirable is entitled to demand that the employer take effective action to stop such undesirable behaviour.
2. The exercise by an employee of the right indicated in section 1 above does not exclude their right to refer the matter to the courts or to the competent law enforcement authorities.

3. Unfounded accusations of undesirable behaviour (i.e. bullying, discrimination or sexual harassment) are prohibited and may result in the person making the accusations being held liable under generally applicable law.
4. The employer shall take preventive and corrective measures, as provided for in the Policy and in generally applicable laws, to ensure that the work environment is free from undesirable actions, both by supervisors and other employees.
5. The employer is obliged to provide the necessary assistance to victims of undesirable actions.

## **§6**

### **Responsibility**

1. Persons committing undesirable actions (i.e. bullying, discrimination or sexual harassment) are subject to the liability provided for by applicable law, in particular the provisions of the Labour Code, the Penal Code and the Civil Code. The same liability may apply to persons who incite or aid another person to commit undesirable actions.
2. The liability referred to in section 1 above shall also apply to persons who wrongfully accuse others of the acts referred to in section 1 above.
3. Undertaking undesirable actions and creating situations encouraging such actions, as well as accepting their manifestations, may be considered, in specific circumstances, a serious violation of basic employee obligations and result in sanctions provided for by law, including termination of the employment relationship without notice due to the employee's fault.

## **Chapter IV**

### **PROCEDURE**

## **§7**

### **REPORT**

1. Any employee who believes that they have become the subject of (or have suffered) an undesirable action (i.e. bullying, discrimination or sexual harassment) or who has observed an undesirable action is entitled to report this to the Company.
2. The employee referred to in § 7 section 1 of the Policy should – as far as possible – meticulously record all manifestations of an undesirable action (in particular: date, time, type and manner of behaviour), as well as witnesses to the event (if any) and store this specific data for the purposes of any investigation conducted by the Company or pending before the court or other authorised authorities.
3. The employee referred to in § 7 section 2 of the Policy should bear in mind that in matters related to undesirable actions (i.e. bullying, discrimination or sexual harassment), it is up to the employee to prove that the circumstances have arisen, subject to Article 18<sup>3b</sup> § 1 of the Labour Code. Therefore, a person who suspects that undesirable actions are being taken against them should bear in mind that they will have to indicate the existence of specific facts, specific manifestations of bullying, discrimination or sexual harassment, as well as the persons responsible for these actions.
4. The report referred to in § 7, section 1 of the Policy should include: a concise presentation of the facts and any evidence to support the circumstances cited, as well as an indication of the person or persons perceived as the perpetrator or perpetrators of the undesirable action. The employee referred to in § 7 section 1 of the Policy should sign and date the report.

Reports shall be made as follows:

- 1) to their immediate superior in written or electronic form to the e-mail address of the immediate superior;

- 2) if there are reasons that exclude reporting to the immediate supervisor (e.g. the immediate supervisor's participation in the undesirable actions), the report should be made:
  - a) via the Platform, by completing an encrypted online Report form available at <https://app.sygnanet.pl/vbceurope/pl>;
  - b) to the Compliance Officer at the address VBC Europe sp. z o.o., Topole 68, 89-600 Chojnice with the note 'Reporting of undesirable actions to the Compliance Officer' confidentially or in electronic form to the e-mail address: [compliance.officer@vbc.co](mailto:compliance.officer@vbc.co);  
or
  - c) to the Head of HR at the address: VBC Europe sp. z o.o., Topole 68, 89-600 Chojnice with the note 'Reporting of undesirable actions to the Head of HR' confidential or in electronic form to the e-mail address: [mjaranowska@vbc.co](mailto:mjaranowska@vbc.co).

A report made in a manner other than that specified above shall not be considered in the manner provided for in the Policy. A person making a report in matters covered by this Policy is not entitled to the protection due to a whistleblower within the meaning of the Act of 14 June 2024 on the protection of whistleblowers (Journal of Laws of 2024, item 928, as amended).

5. The template for the report is Appendix 1 to the Policy. If an employee submits a report without using the template, this does not entitle the Employer to refuse to process the report, provided that the report contains the elements indicated in section 4 above, however, the use of the above-mentioned template may facilitate the handling of the case.
6. The reports referred to in section 4, item 1) of the Policy shall be immediately forwarded by the immediate supervisor and the Head of HR to the Compliance Officer for further handling.
7. If the Compliance Officer is a party to the proceedings, the report shall be submitted directly to the Company's Management Board. If a member of the Company's Management Board is a party to the proceedings, regardless of their function, the report shall be submitted directly to the Compliance Officer.
8. The Compliance Officer has the obligation to inform the Management Board of the Company or, if the report concerns a member of the Management Board of the Company, the Management Board of VBC US, of the receipt of each report. In the event that a member of the Management Board of the Company is also a member of the Management Board of VBC US, such member of the Management Board of the Company shall be omitted from the report addressed to the Management Board of VBC US.
9. Within 7 (seven) days from the date of the report, feedback regarding the acceptance of the report shall be sent to the person making the report, provided that the report was not made anonymously and the reporting person left their contact details.
10. The Compliance Officer, after a preliminary formal investigation of the report, may:
  - a) if, due to the circumstances of the case, it is considered objective, to conduct mediation, which aims to clarify and amicably resolve the case and possibly prevent similar situations in the future;
  - b) refer the case for consideration by the Commission if, due to the circumstances of the case, it considers that mediation is not appropriate (for example, if it considers that handling the case first, as described in § 7 section 10 letter a) Policy, may prevent the application of any of the Sanctions referred to in § 10(1) or (2) of the Policy), or when the mediation has failed and there is a likelihood that an undesirable action has occurred.
11. When delivering a case for consideration by the Commission, the Compliance Officer shall justify the decision.

## §8

### Commission

1. The members of the Commission are appointed and dismissed by the Company's Management Board.
2. **The Management Board shall appoint the members of the Commission by 31 January of the calendar year in which the term of office of the previously appointed members of the Commission expires.** The Management Board shall appoint the members of the Commission for the first time after the introduction of this Policy within 30 (thirty) days of the Policy coming into force. **For an effective appointment to the Commission, it is necessary** for each appointed member of the Commission to submit **a statement accepting the appointment.** If the appointed member of the Commission **does not submit such a statement** within **7 (seven) working days of receiving the appointment information, the appointment shall expire.**
3. Subject to the provisions of this section and § 8 section 4 of the Policy, **the Commission shall consist of 2 (two) members, appointed for a term of 2 (two) years. The term of office of the first Commission shall expire on 31/01/2027.** The **terms of office** of the members of the Commission appointed consecutively, including in the event of a delay in their appointment, **shall always expire on 31 January** of the second calendar year following 31 January of the calendar year in which they were appointed<sup>[1]</sup>. The terms of the Commission members shall be joint, i.e. if a new person is appointed to the Commission during the calendar year in which the term of office of the Commission members began or in the following calendar year of that term of office, that person's term of office shall also expire on 31 January, when the term of office of the originally appointed Commission members expires.
4. **The mandate of the members of the Commission expires, as a rule, on the date of expiry of their term of office,** however, if, on the date of expiry of the term of office or on the date of commencement of the term of office of the members of the Commission for the next term of office, the current members of the Commission conduct proceedings initiated by a report, **then their mandate to conduct this specific case is extended until its completion.** The mandate of the members of the Commission to act in all matters shall also be extended if, after the expiry of their term of office, the Management Board has not appointed the members of the Commission for a further term of office. **Furthermore, the mandate of a member of the Commission shall expire upon:** the resignation of a member of the Commission, the dismissal of a member of the Commission by the Management Board, the death of a member of the Commission.
5. A two-person Commission shall be appointed in such a way as to ensure that the proceedings are conducted as efficiently as possible and that the case is fully investigated, according to the rules of objectivity, impartiality and confidentiality.
6. If a place **on the Commission becomes vacant** during the term of office, **the Management Board shall fill the vacancy within 30 (thirty) days of the vacancy occurring.** If a member of the Management Board is a Party to the proceedings at the time of the vacancy, the Management Board of VBC US shall fill the vacancy.
7. The following **may not participate** in the work of the commission examining a specific case arising from a report: the employee making the report, a Party to the proceedings or a person directly subordinate to them or related to them by family or special relationship (***grounds for exclusion from work***), including members of the Company's Management Board and members of the Management Board of VBC US. In the circumstances described in the previous sentence, a member of the Commission to whom the grounds for exclusion from work apply shall be excluded from the work of the Commission or shall be excluded from it at the request of at least one other member of the Commission, if that member is aware of the existence of the grounds for exclusion from work, and the Management Board of the Company or the Management Board of VBC US, if a member of the Company's Management Board is a Party to the proceedings, immediately, if possible, no later than **within 3 (three) working days** from the date of becoming aware of such a need,

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<sup>1</sup> For example, the term of the members of the Commission appointed on 31 January 2027 shall expire on 31 January 2029.

**appoint a member of the *ad hoc* Commission to the Commission** in place of the member excluded from the Commission in this particular case.

8. The reporting employee or the Parties to the proceedings may submit a written, reasoned request to the Management Board of the Company or the Management Board of VBC US, in the event that a member of the Management Board of the Company is a Party to the proceedings, for the exclusion of a member of the Commission from the work of the Commission in a specific case caused by the report, if there are grounds for exclusion from the work. The Management Board of the Company and the Management Board of VBC US are not bound by such a request, but if it is accepted, the provisions of § 8 section 7 of the Policy shall apply accordingly.
9. If any member of the Commission has reasonable doubts about their impartiality in a given case, not only due to the occurrence of grounds for exclusion from the work, they have the obligation to immediately exclude themselves from participating in the work of the Commission. An *ad hoc* member of the Commission is appointed in place of the member of the Commission who has excluded themselves from the work of the Commission in a given case, in accordance with the rules described in § 8 section 7 of the Policy, under the rules set out in section 5 above.
10. The Commission deals with matters caused by a report at meetings or otherwise appropriate for carrying out a specific action required to consider the matter. The time of participation of each member in the work of the Commission is counted as their working time. During the Commission meetings or while performing other activities related to the case in question, its members are exempt from other current professional duties.
11. At the first meeting of the Commission in a given term, the members of the Commission shall elect a chairperson and deputy chairperson from among themselves. The chairperson shall organise the work of the Commission, coordinate its deliberations and, in arrangement with the other members of the Commission, set the dates of its meetings and other activities undertaken by the Commission. In the event that the chairperson of the Commission is unable to participate in the consideration of a matter or if there is a temporary impediment to the performance of their duties, their duties shall be performed by the deputy chairperson. If the place of the chairperson or deputy chairperson of the Commission becomes vacant during the term of office, also in the case of the appointment of a new person to the Commission during the term of office, the members of the Commission shall elect the chairperson and deputy chairperson of the Commission again at the first joint meeting in the new composition.
12. Commission members are obliged to keep confidential all information obtained in connection with their participation in the work of the Commission, based on written declarations. Personal data obtained in the course of the Commission's work is subject to protection in accordance with applicable law. A member of the Commission may only commence work within the Commission after signing a confidentiality statement, unless a general obligation to this effect already arises from the legal relationship between the member of the Commission and the Company.
13. The objective of the Commission is:
  - a) to conduct an investigation aimed at clarifying the circumstances presented in the report;
  - b) subsequently, to present the Commission's report to the Company's Management Board or, if a member of the Company's Management Board is a Party to the proceedings, to the Management Board of VBC US, including the findings of the Commission's proceedings, the results of the proceedings and any recommendations for further action.



## §9

### Proceedings before the Commission

1. **The first meeting of the Commission on a specific matter** arising from a report shall be **convened by its chairperson, within three (3) working days from the date of referral of the matter to be considered** by the Commission in accordance with § 7 (10)(b) of the Policy.
2. The Commission shall conduct its proceedings at meetings held at the employer's registered office, at any other place indicated by the chairperson or deputy chairperson, or by means of direct remote communication arrangements ensuring real-time audiovisual transmission and identification of the meeting participants.
3. As a rule, the Commission considers cases at meetings, in the full composition of 2 (two) members, however, in individual cases, with the consent of all members of the Commission, the performance of a specific action as part of the Commission's work may be entrusted to one member of the Commission; in such a situation, the provisions of § 9 section 7 of the Policy shall apply accordingly.
4. **Notification** of the Parties to the proceedings and witnesses of the **date of the meeting** with their participation shall be given **at least one day in advance**. In urgent situations, this deadline may be shortened. Notification by telephone or e-mail is permitted. Notifications shall be made by the Commission's chairperson or their deputy. The person making the report may act as a witness and be asked to appear before the Commission if they are not a Party to the proceedings.
5. The Commission should carefully analyse the content of the report, strive to establish and clarify the facts described in the report or inferable from it, including analysing the evidence attached to or indicated in the report, and, if necessary, try to gather other evidence that may be useful for an objective assessment of the report.
6. Provided that the technical possibilities exist and the persons present at the Commission meeting (including the Party to the proceedings or witness) agree, the course of the Commission meetings may be recorded by means of devices that enable simultaneous sound and image recording. **Before the recording of the Commission meetings, the persons present at the meeting shall be informed of this fact and their consent to the use of their image shall be obtained.** Notwithstanding the above, a written summary report shall be drawn up of the Commission meetings, including:
  - 1) indication of the date and place of the Commission meeting or information that it took place using means of direct remote communication ensuring real-time audiovisual transmission;
  - 2) composition of the Commission;
  - 3) the particulars (first names and last names and positions, if any) of the participants in the meeting;
  - 4) a list of the actions taken;
  - 5) a general description of the course of the actions taken (e.g. the main theses of the statements of the parties to the proceedings or witnesses heard);
  - 6) possible next date of the Commission meeting with an indication of the actions planned to be taken at the meeting;
  - 7) signatures of Commission members.
7. The reporting person, the Parties to the proceedings or a witness shall be heard on the circumstances presented in the report, to the extent necessary and expedient for the proper clarification of the case. The person affected by the undesirable action may not be heard in the presence of any person indicated as the perpetrator, unless the person affected by the undesirable action requests or agrees to the confrontation.
8. The party to the proceedings may present evidence to the Commission in support of its claims, in particular it may request that witnesses be heard. The Commission may disregard a request for evidence, including a request to hear a witness, if it considers that it is not relevant to the clarification of the circumstances covered by the report or that its examination shall not be useful for the proper examination of the case (e.g.



when the factual circumstance, for the demonstration of which the evidence was to be examined, has already been demonstrated by other evidence).

9. The Commission has the right to ask the person being heard questions concerning the circumstances covered by the report or relevant to the proper clarification of the case. Persons who are to give evidence before the Commission may not participate in the hearing of another person.
10. With the exception of the members of the Commission and the members of the Company's Management Board, and excluding cases in which any of these persons is a Party to the proceedings, only persons invited by the Commission and admitted to participate in the meeting may be present at the Commission's meetings. The Commission may refuse to allow any person to participate in the Commission meeting if their condition or behaviour may disrupt the work of the Commission.
11. The responsibilities of the Commission in the course of the explanatory proceedings on the subject of the report include:
  - 1) conducting explanatory interviews with the Parties to the proceedings (hearing the Parties to the proceedings) and with the person making the report (if possible);
  - 2) hearing witnesses indicated in the report or by the Parties to the proceedings during the proceedings, as well as hearing other witnesses whose testimony may be useful for the objective determination of the facts of the case, e.g. witnesses indicated by the heard witnesses or previously unidentified witnesses whom the Commission deems may be useful to hear;
  - 3) examining other evidence indicated in the report or attached by the Parties to the proceedings or collected by the Commission independently, if such evidence is relevant to the clarification of the circumstances covered by the report or useful for the proper examination of the case;
  - 4) taking the necessary actions to fully clarify the circumstances of the case.
12. When investigating a case reported, the Commission is not bound by the scope of the report, including the right to admit and consider evidence at its own discretion and to make its own assessment as to whether certain behaviour can be classified as specific types of undesirable behaviour or other types of behaviour that are not undesirable.
13. The chairperson of the Commission shall draw up **a report** of the proceedings conducted, including:
  - 1) a description of the case in which the proceedings were conducted;
  - 2) the duration of the proceedings before the Commission;
  - 3) the details of the Parties to the proceedings;
  - 4) the details of the participants in any actions taken in the course of the proceedings before the Commission, in particular the details of the witnesses heard;
  - 5) the position of the Commission with regard to:
    - a) a statement as to whether, in the Commission's opinion, the undesirable action or undesirable actions have occurred or are still occurring,
    - b) a statement that the Commission is unable to make an independent assessment as to whether the undesirable action or undesirable actions have occurred or are still occurring,
 and also,
    - c) in the event that the Commission determines that the undesirable action or undesirable actions have occurred or are still occurring, indicating proposals for sanctions that should be considered by the Employer to be applied to the perpetrator or perpetrators of the undesirable action or undesirable actions,
    - d) if it is determined that the Commission is not able to independently assess whether the undesirable action or undesirable actions have occurred or are still occurring, an indication of a proposal to refer the case to external advisers (e.g. legal advisers) for analysis, in order to obtain their opinion on the case and for the Employer to take further steps on the basis of this;

- 6) a concise justification containing:
    - a) a description of the facts established by the Commission,
    - b) an indication of the evidence carried out by the Commission in the course of the proceedings, if necessary, with an indication of the evidence that the Commission did not believe, including evidence that could not be examined, together with an explanation;
  - 7) possible recommendations to take other specific actions for the future, e.g. preventive actions.
14. The Commission presents its position, referred to in § 9 section 13 item 5) of the Policy, after an undisclosed meeting of the Commission members. The meeting includes a discussion on the position to be issued by the Commission and the main reasons justifying this position, as well as writing down the operative part of the position. The Commission's position is, as a rule, issued unanimously. In the absence of unanimity among the members of the Commission, each member of the Commission shall write down the substance of their position as part of a dissenting opinion and shall be under the obligation to justify this position in writing before signing the Commission's report. This circumstance is noted in the Commission's report, which in such a situation includes two individual positions of the Commission members along with a separate justification for each of them.
15. **The Chairperson of the Commission shall draw up a report within three (3) working days** of the date of the last meeting of the Commission **and send it to the second member of the Commission so that they may read it and, if necessary, submit or attach comments** in writing, including the justification of the dissenting opinion, **within 1 (one) working day. On the next working day** after the Commission's Chairperson has sent the Commission Report, **all Commission Members shall be obliged to sign the Commission Report**; if the justification for a dissenting opinion has not been provided by that time, this shall be noted in the Commission Report.
16. The Commission's report shall be accompanied by the notification and the report drawn up by the Compliance Officer, unless the Compliance Officer is a Party to the proceedings, together with the summary minutes of the Commission's meetings and the documentation collected in the course of the proceedings before the Commission. The Chairperson of the Commission shall immediately forward **the Report signed by all members of the Commission, together with the Appendices, no later than within 2 (two) working days from the date of its signature by all members of the Commission, to the Management Board of the Company or the Management Board of VBC US**, depending on the circumstances of the case. **In the event that it is necessary to translate the report into a foreign language** (for the purposes of this section, it is only permissible to translate it into English) then **the deadline** referred to in the previous sentence **shall be extended to four (4) working days, and in addition, the Chairperson of the Commission shall be entitled to forward** to the Management Board of the Company or the Management Board of VBC US, **exclusively, an abridged extract from the Commission's report**, translated into English, comprising only those **elements** of the report referred to in **§ 9 section 13 items 1), 2), 3), 5)**; in such a case, a translation of the entire Commission report shall be provided at a later date at the request of the Company's Management Board or the Management Board of VBC US.
17. **The Commission shall endeavour to** conduct the investigation efficiently and effectively and **to submit** a report to the Company's Management Board or the Management Board of VBC US **no later than three (3) weeks from the date on which the case was referred to it for consideration.**

## §10

### Sanctions

1. If the Commission finds that an undesirable action or undesirable actions have taken place - depending on the circumstances of the specific events and their consequences, the findings made, including the type and scale of the perpetrator's or perpetrators' actions - the Company's Management Board shall decide on the application of one or more (provided they are not mutually exclusive) sanctions provided for

by law or agreements forming the basis of the Company's partnership with the perpetrator of the undesirable action or the employing entity, taking into account the adequacy and efficiency of the measures taken. The Company's Management Board makes decisions in the aforementioned scope at its own discretion and, to the extent permitted by law or the provisions of the agreement between the parties, may, in particular:

- 1) give appropriate instructions,
  - 2) conduct an exploratory interview,
  - 3) punish the perpetrator with a disciplinary penalty (warning, reprimand),
  - 4) modify the perpetrator's working and remuneration conditions,
  - 5) terminate the perpetrator's contract (including the employment contract) with notice,
  - 6) terminate the perpetrator's employment contract without notice (in situations of gross violations of basic duties, including employee duties),
  - 7) terminate the contract (legal relationship) between the Company and the entity employing the perpetrator (regardless of the legal form of this partnership).
2. If the perpetrator or co-perpetrator of the undesirable action is a member of the Company's Management Board, the decision on the application (and execution) of the sanctions referred to in section 1 above, as well as other sanctions resulting from contracts or acts of appointment which form the basis for the performance of duties by a member of the Company's Management Board, shall be made by the Management Board of VBC US.
3. If possible, the employer can transfer the affected employee – at their request or with their consent – to an equivalent position, while maintaining the right to the current remuneration, or otherwise prevent direct contact between the affected employee and the perpetrator of the undesirable action.
4. Within 3 (three) months from the date of confirmation of acceptance of the report to the reporting person, the reporting person shall be provided with feedback on the handling of the report and the conclusion of the proceedings triggered by the report, if they have been concluded by that time (if the proceedings triggered by the report have not been concluded, the person who made the report is given further feedback after the end of the proceedings). In the event that the person who made the report is not a party to the proceedings, the scope of the feedback provided should be limited to indicating that the matter has been or is being investigated. Feedback is provided by the Compliance Officer or the Director of the HR Department.

## Chapter V

### PREVENTIVE MEASURES

#### §11

##### Preventive and corrective measures

1. The employer shall take effective action against undesirable behaviour in the place of work and in connection with work, in particular by:
  - 1) taking information and preventive measures indicated in § 11 section 2 of the Policy, aimed at preventing and counteracting the occurrence of undesirable actions;
  - 2) taking intervention measures aimed at the immediate cessation of the undesirable action or undesirable actions, in particular on the basis of reports received in accordance with Chapter IV of the Policy.
2. The employer shall take preventive measures to counteract undesirable actions, consisting in particular of:
  - 1) compulsory training for all employees and managers on the issues of bullying, discrimination and sexual harassment and how to counteract these phenomena;
  - 2) conducting systematic training or presentations of videos on counteracting bullying and discrimination (this also applies to sexual harassment) for employees, i.e. **at least once a year**;

- 3) creating and providing employees with information materials on undesirable actions.

## **Chapter VI**

### **FINAL PROVISIONS**

#### **§12**

##### **Entry into force of the Policy, control of its implementation**

1. This Policy shall enter into force on 01/04/2025 and shall apply to reports made after that date.
2. Once a year, or more often if there is a justified need, the Employer, together with employee representatives, shall assess the provisions of the Policy in terms of their relevance and usefulness, as well as the possible need to make changes or additions to them; the subject of the assessment shall also be the practice of applying the Policy, with the proviso that employee representatives (with the exception of those appointed to the Commission) shall not have access to the case files of individual proceedings initiated on the basis of reports made under the Policy.

**Appendix 1** to the POLICY ON COUNTERACTING BULLYING, DISCRIMINATION AND SEXUAL HARASSMENT  
in VBC EUROPE sp. z o.o.

## FORM FOR REPORTING ACTS OF BULLYING, DISCRIMINATION OR SEXUAL HARASSMENT

**in VBC Europe sp.z.o.o.**

Name of the unit concerned by the report:

Description of the incident (\*indicate who is affected and who may have knowledge of the incident; describe the situation and provide objective evidence of it, if the reporting person has it; indicate the date of the incident; describe the possible cause):

First name and last name and contact details of the Reporting Person (\*optional):

\* delete as appropriate

**Appendix 2** to the POLICY ON COUNTERACTING BULLYING, DISCRIMINATION AND SEXUAL HARASSMENT  
in VBC EUROPE SP. Z O O.

**Statement of awareness of the Policy on Counteracting Bullying, Discrimination  
and Sexual Harassment**

I declare that on \_\_\_\_\_ I was acquainted by the Employer with the content of the Policy on  
Counteracting Bullying, Discrimination and Sexual Harassment in force in the workplace of VBC Europe sp. z o.o.

\_\_\_\_\_  
(date and signature of the employee)