



APATOR GROUP HUMAN RIGHTS POLICY, ALSO KNOWN AS "POLITICS"

I. PREAMBLE

In order to ensure the highest standards in protection of human rights and based on binding international and domestic legal regulations, the Executive Board of Apator S.A. adopts this Policy and all the entities cooperating with Apator S.A. and entities in Grupa Apator, regardless of their role, be it employees, service providers, suppliers, customers or other business partners are recommended to follow it in their relations with persons employed in entities in Grupa Apator or cooperating with entities in Grupa Apator regardless of legal base of such cooperation.

1. This Policy is a supplement to the Apator Group Code of Ethics in respecting human rights throughout the value chain.
2. The adopted Human Rights Policy is in line with international legal standards and norms of, inter alia, :
 - International Charter of Human Rights,
 - The core conventions of the International Labour Organisation (ILO),
 - OECD Guidelines for Multinational Enterprises,
 - UN Guiding Principles on Business and Human Rights.

II. POLICY OBJECTIVE

This Policy has been adopted in order to promote human rights in Grupa Apator, to emphasise their role in social life, economic life and business relations, to define basic principles related to the respect of human rights, as well as measures enabling to prevent human rights violations or to remove possible violations of human rights.



The Human Rights Policy is also a commitment of the Companies of the Apator Group to analyse and assess the practices of its counterparties or other business partners made before entering into cooperation with them, and to enforce the respect of human rights from them.

The policy is also a commitment of the Companies of Grupa Apator to actively respond to all manifestations of human rights violations and, where possible and reasonable, to apply appropriate sanctions or to inform relevant authorities of the violations that have occurred.

III. BASIC PRINCIPLES RELATED TO THE PROTECTION OF HUMAN RIGHTS

1 We impose exclusions and restrictions on cooperation with customers involved in arms and dual-use technologies, with countries that have not ratified the UN core legal documents on human rights or are subject to UN/EU sanctions due to non-compliance with human rights or internal repression as defined in the "Universal Declaration of Human Rights", the "International Covenant on Civil and Political Rights" and the "Additional Protocol to the Convention on the Rights of the Child" on the involvement of children in armed conflict.

2 We respect human beings, respecting their rights to life, health, personal dignity, privacy and diversity, as well as their freedom of thought, conscience, religion and freedom of expression.

3 We ensure that the principle of equal treatment of employees, suppliers and other business partners is upheld, embracing equality, taking into account applicable laws and the standards set by them.

4 We negate any action that would in any way restrict human freedom, physical or mental integrity or discriminate against employees or business partners of the Companies of Grupa Apator.

5. we guarantee conditions in the place of work or cooperation for the safe and dignified performance of work or services, respecting the right to privacy and family life.

IV. SPECIFIC RULES FOR EMPLOYEES, SUPPLIERS AND OTHER BUSINESS PARTNERS AND THE COMMUNITY WITH WHICH APATOR GROUP COMPANIES COOPERATE

In accordance with the Human Rights Policy, the companies in the Apator Group undertake to:

1) towards employees

- to prevent discrimination and practices that violate human dignity,



- not to use forced labour and child labour,
- to respect the right of association and collective bargaining,
- to protect the health of workers,
- to respect for the rights to privacy and family life,
- to create conditions for safe and decent work,
- to apply the sanctions provided for by law in the event of human rights violations, including those related to informing the competent authorities or terminating the employment contract;

2) to suppliers and other business partners

- to promote respect for human rights throughout the supply chain,
- to promote respect for human rights in cooperation with other business partners,
- to apply a policy for the selection of suppliers or other business partners, including environmental, social and ethical criteria,
- to promote cooperation with those suppliers or business partners that respect human rights,
- to apply the sanctions prescribed by law against those suppliers or other business partners who commit human rights violations, including by terminating their cooperation with them;

3) towards the community with which companies from Grupa Apator cooperate

- to promote respect for human rights, particularly in places with less developed legal and institutional systems,
- to respect, support and promote human rights in the communities to which the Companies of the Apator Group provide services, including free of charge,
- to guarantee security, including cyber security, to ensure human rights are respected,
- to support activities and projects that serve to protect human rights or promote actions to extend or strengthen such protection,
- to draw the attention of relevant actors to perceived human rights violations or situations posing a risk of such violations.

V. FINAL PROVISIONS



1. The Management Boards of the companies in the Apator Group are responsible for the performance of this Policy, which undertake to:
 - to inform the employees, suppliers and other business partners about the adopted Human Rights Policy and to oblige them to apply it in a customary manner in the companies of Grupa Apator,
 - inclusion of relevant contractual provisions in concluded contracts concerning the suppliers and other business partners becoming acquainted with the Human Rights Policy binding in Grupa Apator and containing the obligation to apply it,
 - adopt specific procedures to implement the provisions of the Policy;
 - to delegate the duties related to monitoring its observance to the persons employed in the Companies in Grupa Apator;
 - the application of sanctions related to human rights violations against employees, suppliers or other business partners.



Aparator SA with its registered office in Toruń entered in the National Court Register under no. 0000056456, Company's documents are stored at: District Court in Toruń, 7th Economic Division of the National Court Register, Share Capital of PLN 3.264.707,30 paid-up in full. Management Board: President – Maciej Wyczesany, Member of the Executive Board – Łukasz Zaworski, address of the headquarters: Gdańska 4A lok. C4, 87-100 Toruń, Poland, main address of business activity, address for correspondence: Ostaszewo 57C, 87-148 Łysomice, Poland, tel. +48 56 61 91 111, fax +48 56 61 91 274, e-mail: apator@apator.com, Tax Identification Number PL-879-016-68-96, REGON 870037630, BDO: 000003377, other addresses of business activity: ul. Wólczajska 125, 90-521 Łódź, Poland; Ostaszewo 57I, 87-148 Łysomice, Poland