

**DIVERSITY MANAGEMENT
POLICY**



AMICA GROUP

§ 1

[Definitions]

Whenever this Policy refers to:

1. **Amica Group** – it shall be understood as the parent company, i.e. Amica S.A. with its registered office in Wronki, and its subsidiaries covered by the consolidated financial statements, listed in the consolidated financial report.
2. **Code of Conduct for Business Partners** – it means a document that sets out the standards of conduct to which we require our Contractors to adhere in matters relating to compliance with laws and regulations, corruption and bribery, social and working conditions, human rights and environmental issues.
3. **Counterparty** – it shall be understood as a natural or legal person, as well as an organisational unit without legal personality, being a party to a contract concluded with any of the Amica Group companies. Counterparties include both Customers and Suppliers of Amica Group. The above shall not apply when only Amica Group companies are parties to contracts.
4. **Stakeholders** – it shall be construed as entities (individuals, communities, institutions, organisations, offices) that can influence the Amica Group or are influenced by its activities.
5. **Code of Ethics** – it means a document setting out the standards of conduct that Amica Group employees are obliged to observe in matters relating to compliance with laws and regulations, social and working conditions, human rights and environmental issues.
6. **Policy** – it means this Diversity Management Policy document.
7. **Employee** - shall mean any natural person working for any Company, regardless of the type of employment contract concluded and position held, involved in any purchasing process, in particular entering into contracts with Suppliers.
8. **Company** - means a company that is part of the Amica Group.

§ 2

[Policy objective]

1. **Diversity** - a term which, in the context of Corporate Social Responsibility (CSR), refers to the variety and diversity of employees. Diversity may include gender, race, national and ethnic origin, religion, belief, irreligiousness, worldview, degree and type of disability, health status, age, psychosexual orientation or gender identity, as well as family status and lifestyle. **Managing diversity** means recognising the differences within an organisation and consciously developing strategies, policies and programmes which create an environment where these differences are respected, valued and utilised to the benefit of the organisation.
2. In developing the Policy we have drawn on international best practice and standards including: UN Global Compact Principles (Principle 6), UN Sustainable Development Goals (Goals 4, 5 and 10), International Labour Organisation Conventions (Convention 100 and 111).

3. The overriding aim of this Policy is to create a working environment in which every employee feels respected, valued and has the opportunity to develop their potential, contributing to the further development of the organisation and increasing its competitive advantage. We realise that only a diverse team is able to respond to the diverse needs of our Counterparts and other Stakeholders.
4. In the Amica Group, we also transfer similar values to our relations with the external environment: our counterparts, consumers, local community and all other stakeholder groups with whom we want to maintain a dialogue based on respect, openness and accessibility.
5. This Policy shall apply to all Amica Group and concern all Employees.

§ 3

[Strategic policy areas]

1. As part of the Policy, we have identified 4 strategic areas within which Diversity Management activities will be implemented.
2. The Diversity Management Policy covers the following areas in the Amica Group:
 - a. Management model
 - b. Staff issues
 - c. Relations with counterparties
 - d. Relations with consumers and other stakeholders

§ 4

[Diversity and the governance model at Amica Group]

1. At Amica Group we create an organisational atmosphere and culture that ensures respect for diversity by integrating diversity into our corporate governance, policies and procedures used in our organisation for both our internal and external stakeholders. These values are reflected in Group-wide documents: Code of Ethics, Sustainable Development Strategy, Integrated Management System, Leadership Code, Code of Conduct for Business Partners.
2. **Our objectives in this area:**
 - a. conducting dialogue with external and internal stakeholders
 - b. counteracting discrimination through education and implemented policies and processes
 - c. continuously improving the practical knowledge of managers and employees about the rules of conduct and prevention of irregularities in the workplace
 - d. an organisational culture open to inspiration from other countries and nationalities
 - e. developing the Diversity Management Policy
 - f. actively promoting diversity management
3. We achieve the above objectives by:
 - a. The activities of the Ethics Committee, which operates on the basis of the Code of Ethics and the Ethics Committee Regulations.

- b. Enabling employees to use the anonymous whistleblowing system and apply the Whistleblower Reporting and Protection Procedure at Amica Group.
- c. The activities of the Governance, Risk and Compliance Department, which operates on the basis of the Compliance Policy.
- d. Operation of the Diversity Policy Management Team.
- e. Actively engaging in promoting the diversity management policy in public speaking (e.g. at conferences or panel discussions), promoting the benefits of diversity management and sharing our good practices in this area with other organisations.
- f. Implementing mandatory training for employees on Diversity Management.
- g. Communicating internally and externally on Diversity initiatives taken.
- h. Regular cooperation of Employees within our Companies in many countries in Europe and China, which teaches how to establish effective relations in a multicultural environment. To make cooperation effective we educate employees on cultural differences and encourage internal exchange of knowledge and experience.
- i. Supporting social initiatives for equal opportunities carried out by other entities.

§ 5

[Diversity and staff issues]

1. Diversity in the workplace is one of our key values, contributing to the development of our company and the achievement of our business goals. Our employees are different in many ways, which in turn has a direct impact on their motivation and style of work, the way they communicate or build relationships with other employees. We believe that a team of employees that is diverse in terms of gender, age, culture or religion is a value in itself and is more competitive in the market. These values are embedded in the Sustainable Development Strategy and in the HR policies and solutions implemented by each company in keeping with the assumptions described below:
2. **Our objectives in this area:**
 - a. Equal development opportunities for women and men
 - b. Intergenerational competence exchange and cooperation
 - c. A culture of respect and participation
 - d. Supporting work-life balance
3. The above objectives are implemented within the following areas:

3.1. Recruitment process

As part of diversity management, we want to consciously shape our recruitment messages in order to influence the level of diversity in the employment structure and to eliminate discriminatory practices. Decisions regarding the employment of employees as well as the election of members of the

Management Board and Supervisory Board are made on the basis of objective criteria. Our aim is to ensure versatility and diversity among employees at different levels of the organisation particularly in the areas of gender, fields of education, age and professional experience, with the most important selection criteria being the candidate's high qualifications, professionalism and competence to perform a specific function.

We do this through a **transparent way of conducting external and internal recruitment**, ensured by rules that are embedded in the HR policies and procedures of each company:

- a. a clear and gender-sensitive job description,
- b. transparently described stages of the recruitment process,
- c. publicly available and widely communicated recruitment information,
- d. developing a list of criteria and questions on the basis of which interviews and the selection process will be conducted with all candidates,
- e. encouraging Amica Group employees to apply,
- f. encouraging applications from under-represented groups in the organisation,
- g. developed interview scenario standards, guidelines on discriminatory questions prohibited in job interviews,
- h. incorporating diversity management education in the Amica Group into the onboarding process.

3.2 Professional development

Providing equal promotion and development opportunities is an important part of our diversity management policy. We do this through our Training and Development Policy, where the following principles shall be assumed:

- a. Written terms of reference for all positions, which clearly set out the organisation's expectations of employees to counteract discrimination in remuneration by identifying similar jobs which should carry comparable levels of pay.
- b. A standardised system for the periodic appraisal of employees, whose appraisal criteria do not stereotype or discriminate, but are based on objective grounds.
- c. Regular survey of staff training needs, on at least an annual cycle.
- d. The implementation of training to improve the vocational skills and competences of workers in order to eliminate the phenomenon of groups with limited access to training due to "risk" factors, especially women (those with actual or only potential family commitments), older people, people with disabilities/frequent illnesses.
- e. The implementation of individual development programmes which take into account that the priorities and expectations of employees change at different stages of their lives. We take this into account when planning professional development programmes, without imposing a single model of development in the organisation or a single model of career progression.
- f. Implementation of development programmes for specific groups of employees: we allow the use of, the organisation may implement compensatory measures in the workplace, in the framework of which it offers targeted training or development support for specific groups of employees,

provided that the proposed support is dictated by objective reasons indicating the existence of specific difficulties or needs that can be minimised or eliminated as a result of the proposed support.

- g. The implemented criteria and procedures for determining promotions are devoid of discriminating provisions, i.e. those disadvantaging or favouring employees due to sex, age, (dis)ability, sexual orientation, race, nationality, ethnic origin, religion, belief or irreligiousness. On the other hand, the organisation - within the framework of its compensatory measures - may take into account criteria that are friendly to those people who are in a relatively more difficult situation on the labour market.
- h. Applying work-life balance solutions.

3.2. Salaries and benefits

1. At Amica Group, remuneration principles and benefits are transparent and known to all employees, and their aim is to provide motivation to work and develop professional skills. Written employee remuneration principles are also intended to exclude the risk of discrimination on the basis of gender, age, (dis)ability, sexual orientation, race, nationality, ethnic origin, religion, creed or irreligiousness. We do this through remuneration and benefits policies or other documents adopted in this area by the companies, which assume that the following guidelines are implemented:
 - a. Conducting salary monitoring that assesses how the basic salary, financial and non-financial allowances of employees at different levels or positions compare to those of women and men employed in the same positions, those with comparable length of service in the organisation, those with different levels of efficiency in similar positions, those with different nationalities, different employment contracts/flexible forms of employment in similar positions.
 - b. Clear criteria for grading into existing pay grades.
 - c. Criteria for determining salaries and bonuses for individual positions.
 - d. Criteria for determining non-wage benefits granted for work performed.

§ 6

[Diversity in the area of relations with consumers and other Stakeholders]

1. The way Amica Group communicates with the external environment should reflect our internal value system: by transferring it to our relations with Stakeholders, we contribute to promoting Diversity Issues and good business practices in this area. These issues are detailed in the policies and instructions adopted in the respective company based on the guidelines below.
- 2. Our objectives in this area:**
 - a. Conducting a dialogue that is based on respect for the diversity of our customers.
 - b. Accessibility to our products and information about Amica Group, taking into account the diverse needs and capabilities of our customers.

- c. Reinforcing, in our communication messages, the idea of partnership relations between household members and presenting various household models.
3. We achieve the above objectives by:
 - a. Language and communication (advertising, in our Social Media and Press Releases) free from content that reinforces harmful social stereotypes and discriminates on the basis of age, gender, disability, nationality.
 - b. Engaging in communication and education projects that promote diversity and destroy harmful social stereotypes.
 - c. The choice of ways of making product information available, communication channels, participation in consumer surveys, organised events, assumes different possibilities and needs of our customers.
 - d. Monitoring and analysing complaints due to inappropriate content, discrimination in marketing messages.
 - e. Diversity-sensitive customer service: Employees and agencies acting on our behalf are trained to serve people with a variety of needs including disabilities and to use diversity-sensitive language.

§ 7

[Diversity in the area of counterparty relations]

1. As part of our corporate social responsibility, we pay attention to maintaining certain standards in contacts with our counterparties. These issues are detailed in the Code of Business Conduct and Purchasing Policy, which are in force in all Amica Group companies, as well as other procedures and instructions in force in the given Company.
2. **Our objectives in this area**
 - a. Working with counterparties who comply with the principles set out in our Code of Business Conduct, in particular regarding:
 - respect for human and workers' rights,
 - respect for social and working conditions,
 - prohibition of child labour and forced labour,
 - prohibition of discrimination,
 - fair remuneration
 - support for suppliers in setting diversity management standards
 - b. Supporting local suppliers (especially in the area of non-manufacturing purchases) and companies that employ disabled or socially excluded people.
3. We achieve the above objectives by:
 - a. Including in the Purchasing Policy and the Code of Business Conduct criteria regarding the respect for Human and Employee Rights in the workplace and the prohibition of discrimination.

- b. Enforcing Suppliers to sign a declaration of compliance with the Code of Business Conduct and verifying that the contractor is implementing the principles contained in the Code of Business Conduct.
- c. The right to exclude companies found to have discriminated and violated Human Rights from the list of suppliers.
- d. Take action to build business relationships with entities that employ people with disabilities or socially excluded people.

§ 8

[Responsibility for implementing the Diversity Management Policy]

1. All Amica Group employees share the responsibility for creating and maintaining a work environment in which decisions are made in accordance with this Policy.
2. At the level of the Parent Company, Amica S.A., the Diversity Management Coordinator, together with the interdisciplinary Diversity Management Team, is responsible for monitoring and developing the provisions of this Policy throughout the Amica Group.
3. The Diversity Team coordinates the application of the Policy by:
 - a. implementation of diversity management support programmes
 - b. coordinating or commissioning diversity management training for senior and middle management in the following areas: team building, task delegation, staff motivation, periodic appraisal, etc.
 - c. coordinating or commissioning events to promote and highlight the benefits of diversity management policies,
 - d. organisation of information meetings for employees on diversity management policies and practices implemented by the organisation,
 - e. reviewing existing processes, procedures and tools in terms of diversity management policies,
 - f. giving recommendations on the implementation of new processes, procedures and tools to support Policy implementation,
 - g. developing tools to assess and evaluate diversity management policies on an annual basis,
 - h. compiling an annual list of initiatives from different areas of the company and monitoring their implementation,
 - i. reporting Diversity Management activities to the Amica S.A. Board of Directors on an annual basis.

§ 8

[Reporting and monitoring irregularities]

An employee who has well-founded doubts about compliance with the Policy is obliged to report his or her observations through the internal whistleblowing channels described within the Code of Ethics.

1. In addition, the Diversity Management Team monitors and analyses:
 - a. complaints from employees about unequal treatment (discrimination) in the workplace,



b. complaints from people outside the Amica Group about discrimination in business dealings, customer service or marketing communications,
and together with the area in which the irregularity occurred, to propose actions to be implemented in order to comply with the policy and to prevent the irregularity from occurring in the future.

§ 9

[Attachments]

1. A list of initiatives implementing the Policy is annexed to this Policy.
2. The list of initiatives is compiled on an annual basis and includes activities implemented by Amica Group companies.