

**Diversity and Anti-discrimination Policy**  
**(hereinafter referred to as the Policy)**  
**of Stalexport Autostrada Malopolska S.A. (hereinafter referred to as the Company)**  
**adopted by the Resolution of the Management Board of the Company No. 03/01/2025**  
**dated 7-th January 2025**

### **1. Declaration, commitments**

The Company is fully committed to promoting diversity, equality and inclusiveness in the workplace. The Company recognizes that the diversity of talents, skills and perspectives is key to success and innovation. Therefore, the Company undertakes to create and maintain a work environment free from any and all forms of discrimination.

### **2. Definitions and scope**

**Discrimination** - unjustified, unfavorable treatment of a person or group of people based on protected characteristics, such as gender, age, disability, ethnicity, religion, beliefs, or sexual orientation.

**Harassment** - unwelcome behavior that has the purpose or effect of violating a person's dignity and creating a hostile, degrading or offensive work environment.

**Bullying** - actions or behavior concerning an employee or directed against an employee, consisting of persistent and prolonged harassment or intimidation of an employee, causing the employee to have a low opinion of their professional suitability, resulting or intended to result in humiliation or ridicule.

**Scope** - The policy covers all aspects of employment, including recruitment, selection of people, working conditions, promotions, training and professional development.

### **3. Commitment to equal opportunities**

The Company guarantees equal employment, development and promotion opportunities for all employees, regardless of their protected characteristics. It supports the individual characteristics of employees and enables them to develop their potential. Decisions regarding employment, training, promotion and other working conditions will be made solely on the basis of employees' qualifications, experience, competence and performance.

### **4. Prevention of discrimination, bullying and harassment**

The Company implements effective procedures and mechanisms against bullying, harassment and discrimination, which include:

- a) regular anti-discrimination training for all employees,
- b) dedicated reporting paths for cases of discrimination, bullying, harassment,
- c) impartial investigations in response to reports and taking appropriate disciplinary action,



d) reviewing recruitment processes, promotions and employee evaluations to ensure they comply with the principles of equality.

## **5. Inclusive work environment**

The Company strives to create an environment where every employee feels respected, valued and has equal opportunities for development. The Company promotes openness, mutual respect and cooperation between people with different characteristics and experiences.

## **6. Training and education**

The Company provides access to regular training and education programs for all employees on diversity, equality and anti-discrimination, aimed at raising awareness and promoting good practices in the aforementioned areas.

## **7. Procedures for reporting violations**

Employees of the Company may report violations of the Policy, in particular incidents of bullying, discrimination or harassment, to the Corporate Governance Ombudsman at the dedicated email address:

[abartosiak@stalexport-autostrady.pl](mailto:abartosiak@stalexport-autostrady.pl)

or directly to their supervisor.

The exercise by an employee of their rights under this Policy shall not be the basis for any unfavorable treatment and shall not result in negative consequences for the employee.

## **8. Monitoring and reporting.**

The Company regularly monitors diversity indicators in areas such as:

- a) recruitment processes,
- b) professional advancement,
- c) development of employee competences.

The analysis of this data makes it possible to assess the effectiveness of operations and identify areas for improvement.

## **9. Liability and sanctions**

Each employee and supervisor is required to comply with the principles laid down in this Policy. The violations of the principles of equal treatment, incidents of discrimination, bullying or harassment shall be treated as serious misconduct that may result in disciplinary sanctions, including termination of employment.

## **10. Review and update of the policy**



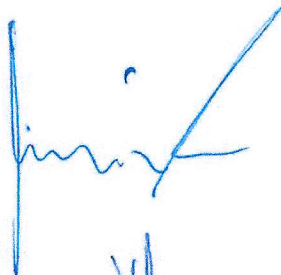
The Policy will be regularly reviewed and updated to ensure its compliance with applicable laws, best practices and the changing needs of the organization.

### 11. Statements / Clauses

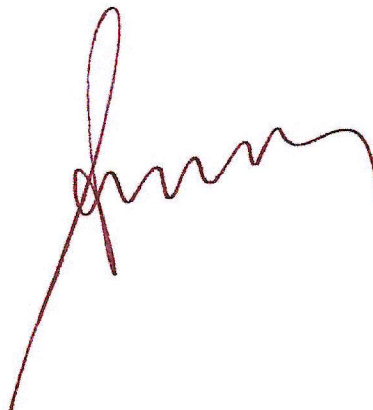
- a) Each employee and each person performing work for the Company on a basis other than employment relationship shall be required to submit a statement attached as Appendix 1 to this Policy,
- (b) In contracts with business partners, consultants/advisers, the Company shall insert a clause attached as Appendix 2 to this Policy.

### 12. Final provisions

To the extent not regulated in the Policy, generally applicable laws and internal regulations of the Group, including in particular the Code of Ethics, shall apply.



RADCA WNV  
K. 1007  
Andrei Barnaboiel Adina



**Appendix 1 to the  
Diversity and Anti-discrimination Policy (hereinafter referred to as the Policy)  
of Stalexport Autostrada Malopolska S.A. (hereinafter referred to as the Company)**

**Statement  
regarding the principles laid down in the Policy**

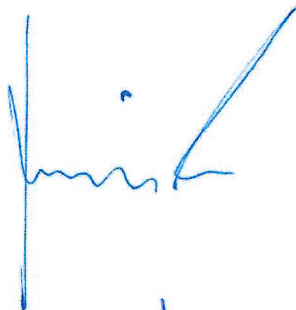
I, the undersigned:

As an employee/person performing work for the Company on a basis other than employment relationship, hereby undertake:

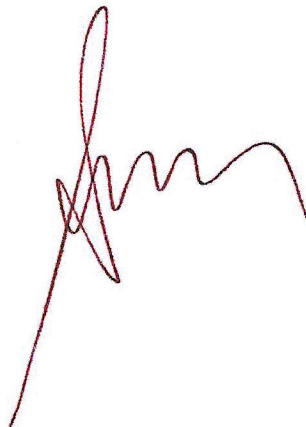
- to abide by the principles laid down in this Policy,
- to maintain a work environment free of behavior that is intimidating, hostile and humiliating or may have a negative impact on the organization and the Company's image,
- to participate in creating a safe working environment based on the principles of justice, freedom and dignity in human relations, where people respect the integrity of others,
- to promptly report any discriminatory situation and/or any situation that may be considered bullying or harassment and/or any behavior known to me that is intended to create a hostile, degrading and/or humiliating work environment, in accordance with Section 7 of the Policy.

.....

(date, signature)



RADCIAKOWSKI  
K. 1. 1967  
ul. Józefa Piłsudskiego 100, 20-030 Lublin



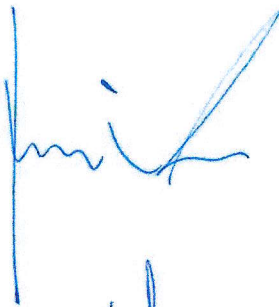
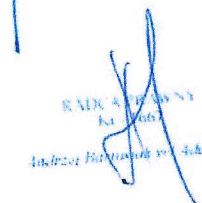
**Appendix 2 to the  
Diversity and Anti-discrimination Policy (hereinafter referred to as the Policy)  
of Stalexport Autostrada Malopolska S.A. (hereinafter referred to as the Company)**

In contracts with business partners, consultants/advisers, the Company shall insert a clause regarding the principles laid down in the Policy:

..... declares that it is aware that the Company and other related entities, as members of the Mundys Group (formerly: Atlantia), conduct their activities in accordance with the principles arising from the Code of Ethics, Compliance Program, Corrupt Practices Prevention Policy, Whistleblower Procedure, Human Rights Framework Guidelines and Diversity and Anti-Discrimination Policy, which have been made available to them and are available on the Company's website at:

<https://www.stalexport-autostrady.pl/pl/o-spolce/lad-korporacyjny>

..... undertakes, in connection with the performance of this Agreement, to act in accordance with the principles arising from the aforementioned: Code of Ethics, Compliance Program, Corrupt Practices Prevention Policy, Whistleblower Procedure, Human Rights Framework Guidelines, and Diversity and Anti-Discrimination Policy.

  
  
KADUCA SPÓŁNOŚĆ  
Sp. z o.o.  
ul. Białostocka 100, 20-030 Lublin

