

Compliance is everyone's responsibility

FAMICORD AG GROUP POLICY DIVERSITY, EQUITY & INCLUSION

adopted by the Management Board of FamiCord AG on March 28, 2025, applies from 1 April 2025.

PURPOSE

The purpose of this Policy is to promote a company culture oriented towards overcoming all forms of discrimination and prejudice, making the workplace an equitable and inclusive environment where every dimension of diversity can find space and generate value. An environment where everyone feels free to be themselves and speak up and contribute in their own way to the best of their ability.

1. INTRODUCTION

Diversity, Equity, and Inclusion, along with respect for human rights, are fundamental elements of the FamiCord AG Capital Group's corporate culture, as well as pillars of our value system. Diverse, equitable, and inclusive teams are more creative and innovative, as members inspire each other to think and act in new ways, and equity ensures that everyone has fair access to resources and opportunities, enabling them to reach their full potential.

At all Capital Group companies, we want to give people the opportunity to be the best version of themselves and unlock their full potential. Everyone must feel free to be themselves, speak up and contribute the best they can. To enable this, we commit to promoting the value of every individual and creating a work environment that is respectful, collaborative, and inclusive.

An environment that respects the dignity and the diversity of all people.

We recognise the importance of protecting and promoting human rights throughout our Capital Group companies.

We are committed to guaranteeing that there shall be no form of discrimination whatsoever in the workplace based on gender, age, ethnic/racial origin, sexual orientation, gender identity, physical ability and neurodiversity, nationality, cultural origin, religion, family status, or socioeconomic situation. Our management is responsible for leading by example and promoting diversity, equity and inclusion throughout the organisation. They are expected to empower diversity, create equity across systems and processes, foster an inclusive environment, address any unlawful discriminatory behaviour, and ensure that diversity, equity and inclusion initiatives are integrated into all aspects of our business.

This Policy draws inspiration from key human rights standards and guidelines, including the United Nations' Universal Declaration of Human Rights, the Charter of Fundamental Rights of the European Union, and the decent work standards outlined in the International Labour Organization (ILO) conventions.

We commit to recognizing the value of every individual and cultivating a workplace that prioritizes respect, collaboration, and inclusivity.

2. SCOPE

This Diversity, Equity & Inclusion (DE&I) Policy encompasses all FamiCord AG Capital Group's employees and delineates the principles and obligations through which the Group will advance DEI across the organization.

3. DEFINITIONS

Diversity - refers to the different traits and characteristics that make each individual unique. These include gender, age, ethnic/racial origin, sexual orientation, gender identity, physical ability and neurodiversity, nationality, cultural origin, religion, family status or socio-economic situation;

Equity – it's about being fair and impartial, adapting and changing processes, systems and environments according to each individual unique needs, removing barriers and making it possible for everyone to achieve their personal goals and reach their full potential;

Inclusion - involves cultivating a work environment where everyone feels welcomed, respected, supported, and valued for their unique attributes and diverse talents. It emphasizes developing collaborative working methods and consistently practicing inclusive behaviours that encourage individuals to bring their authentic selves to work;

FamiCord AG Capital Group - (in this document also the "Capital Group" or the "Group") means the parent company FamiCord AG and the group of legal entities under the same common direct or indirect control of FamiCord AG;

Employee - means any individual engaged by the Group for work, irrespective of their contractual relationship or form of engagement. This includes individuals employed directly or through an agent on a permanent, temporary, full-time, or part-time basis, as well as directors,

contractors, trainees, apprentices, interns, self-employed individuals, consultants, and members of the Board of Directors;

Workplace - means any physical, remote, or virtual environment where Employees perform their duties, interact, or participate in activities related to their job within the Group. This includes, but is not limited to, offices, branches, plants, and other job-related locations. It also encompasses business trips, meetings, training sessions, and events associated with the Group's operations, irrespective of geographic location or legal jurisdiction;

Third Party - means any individual or entity not employed by the Group, including, but not limited to, suppliers, clients, consultants, partners, shareholders, and other external stakeholders, who interacts with the Group's Employees in the Workplace;

Discrimination - means treating an individual or group differently or less favourably based on characteristics unrelated to merit or the inherent requirements of the job or failing to address systemic barriers that prevent equitable access to opportunities. Such characteristics are commonly defined in national and international laws and include, but are not limited to, gender, age, ethnic or racial origin, sexual orientation, gender identity, physical ability, neurodiversity, nationality, cultural background, religion, family status, pregnancy and maternity, and socioeconomic status.

Examples of work-related activities where discrimination can occur include, but are not limited to, recruitment, remuneration, promotion, performance evaluations, access to training and development, occupational safety and health, and other employment-related decisions;

Harassment - is defined as any unwanted verbal, physical, or non-verbal conduct of a moral, sexual, or other nature that either intends to, or has the effect of, violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment for that person.

Examples of harassment include derogatory impersonations of a person, sexual advances or inappropriate comments, mocking the effects of a disability, disrespectful or degrading remarks, racist, offensive, or degrading gestures or images, the use of homophobic, transphobic, or biphobic language, ridiculing someone's religion or beliefs, and sharing or displaying offensive materials in physical or digital spaces;

Bullying - means any unwanted, behaviour from an individual or group that is offensive, intimidating, malicious, or insulting. It also includes the abuse or misuse of power that undermines, humiliates, or causes physical or emotional harm to another person.

Examples of bullying in the Workplace include, but are not limited to, constant groundless criticism of someone's work, spreading malicious rumours, repeatedly belittling someone during meetings, deliberately assigning an unreasonably heavy workload, or posting humiliating, offensive, or threatening comments or photos on social media or other digital platforms.

4. FUNDAMENTAL PRINCIPLES

This Policy is based on the following fundamental principles, which shall apply to all processes and procedures within the Group.

These principles are particularly relevant to HR processes, including but not limited to recruitment, development, performance assessment and advancement, promotion prospects, succession planning, remuneration, parental protection, training opportunities, occupational safety and health, working hours, and rest periods.

Respect Diversity

The Group commits to zero tolerance towards any form of Discrimination.

The Group is committed to ensuring equal opportunities and fair treatment for all individuals while adhering to applicable national and international laws, including any lawful exceptions as permitted by those regulations.

Zero-tolerance towards any form of Harassment, Bullying, persecution, offence, and inappropriate behaviour

The Group is committed to a zero-tolerance approach towards all forms of harassment, bullying, violence, threats, discrimination, abuse of authority, and the exploitation of crisis situations. This includes bullying, malicious conduct, and other behaviours that undermine dignity or create a hostile or offensive environment.

The Group is dedicated to preventing such behaviours through education, awareness, and reporting mechanisms, ensuring that any incidents are addressed promptly, fairly, and with full respect for confidentiality.

Value Differences

Recognise and embrace the value of Diversity by fostering an environment where everyone feels safe, included, and empowered to contribute their unique perspectives and ideas.

The Group constantly strives to build a culture of collaboration, respect, and openness, encouraging the free expression of ideas, particularly those that are unconventional, creative, or innovative. We acknowledge that not every idea or perspective will always be valid, but open dialogue and questioning different views are essential for growth and innovation.

Ensure and promote fair treatment and equal opportunities

The Group is an equal opportunity employer committed to ensuring that all employment-related decisions – including recruitment, development, promotion, and compensation – are made fairly and without discrimination or bias. All Employees, regardless of personal traits and characteristics, must be treated fairly and be given equal opportunities.

Success is a collective effort – everyone should contribute to the best of their ability and take responsibility for achieving shared goals for the benefit of the entire Group.

Promote awareness of unconscious bias

Promote paths to identify and minimise unconscious bias towards one or more groups of people or individuals in the Workplace.

We recognize and embrace the value of Diversity, Equity, and Inclusion, and constantly strive to create a safe, fair, and inclusive culture.

5. POLICY GUIDELINES

DE&I Strategy

Our global approach to Diversity, Equity & Inclusion) is shaped by both internal and external perspectives, informed by global benchmarks, and enriched by ongoing feedback from our Employees.

The strategy is built on three interconnected pillars that function in unison to create meaningful impact.

At FamiCord AG Capital Group we:

- 1. Cultivate an inclusive environment that empowers Employees to express their authentic selves and enables teams to achieve their full creative potential;
- **2.** Build a workplace culture where Diversity is seamlessly integrated into daily practices and decision-making;
- **3.** Continuously explore innovative approaches to engaging with and positively impacting the broader community.

Our goal is to embrace Diversity and foster an Inclusive culture by implementing an adaptable inclusion framework that acknowledges and respects local specificities and national priorities.

The Group Inclusion Model comprises five essential components that together form a comprehensive framework for fostering inclusion and supporting the employee journey:

- **1. Organizational Culture** Shaping an environment where inclusivity and diversity are integral to everyday values and actions;
- 2. Individual DE&I Awareness and Skills Empowering Employees with the knowledge and competencies needed to embrace diversity and foster inclusion;
- **3. Emotional Intelligence** Cultivating empathy and self-awareness to build stronger, more inclusive relationships;
- **4. Inclusive Leadership** Equipping leaders to champion inclusion and model behaviours that inspire diverse teams;
- **5. Supportive Systems** Implementing policies, processes, and tools that ensure equal opportunities and enable inclusion at every level.

We recognize that discrimination can manifest across various aspects of the Workplace. Through our DEI Strategy and, more specifically, our Inclusion Model, we are committed to proactively addressing this risk.

Our goal is to ensure that Diversity and Inclusion are firmly embedded in our business operations and integrated into every stage of an Employee's professional journey at the Group:

from recruitment and remuneration to working hours, leave policies, maternity, job security, assignments, training, performance evaluations, career progression, salary reviews, and even termination of employment.

DE&I Vision

At the Group, we celebrate diversity and foster an inclusive culture where everyone feels empowered to contribute. We value the unique backgrounds and perspectives of our people, ensuring that every fair voice is heard, every reasonable insight shared, and every individual takes ownership of our collective growth.

We firmly believe that collaboration among individuals with diverse experiences and viewpoints drives innovation and delivers outstanding results. Together, we are stronger.

A workplace that embraces diversity and inclusion benefits not only our people but also our business. It strengthens our position as a purpose-driven, trusted organization and employer of choice, where everyone can make a meaningful impact and thrive.

Your Uniqueness, our Strength

Employee Responsibilities

Diversity, Equity and Inclusion is a collective responsibility shared by everyone in the organization.

All Employees are expected to uphold the principles of dignity and respect in all interactions, whether at work, during work-related events (on-site or off-site), or at all Group companies-sponsored activities.

Every Employee is specifically responsible for:

- 1. Respecting the dignity and valuing the diversity of all individuals;
- 2. Contributing to an inclusive environment free from Discrimination, Harassment, and Bullying;
- 3. Actively increasing their awareness of unconscious bias and taking steps to minimize its impact in the Workplace.

Employees who engage in inappropriate conduct or behaviour may face disciplinary actions, as outlined in point 8, "Consequences."

If an Employee feels they have been subjected to any form of discrimination, they are encouraged to seek support, as described in point, "Reporting Inappropriate Conduct."

Leader responsibilities

All leaders are responsible for identifying and minimising barriers to equity. Their responsibilities include but are not limited to:

- 1. Creating an Inclusive and safe work environment that supports DEI and that is free from Discrimination, Harassment and Bullying;
- 2. Role modelling Inclusive and respectful behaviours, valuing all perspectives and listening to diverse points of view;
- 3. Cultivating a culture that inspires respect for all Employees and any other stakeholders in the work environment;
- 4. Ensuring all Employees collaborate, speak up, respect each other and actively listen to diverse opinions;
- 5. Appropriately addressing any other behaviour not consistent with this or other Group Policies/Procedures, or with applicable laws relating to equal opportunities, diversity, or inclusion.
- 6. Taking proactive steps to ensure that systems and processes are equitable, addressing individual needs and eliminating barriers to success.

6. DISCRIMINATION, HARASSMENT AND BULLYING

The FamiCord AG Capital Group is committed to fair treatment and equal opportunities in employment.

All employment decisions are based on merit, qualifications, skills, performance, and achievements. We strictly prohibit discrimination against any Employee or job applicant on the basis of non-work-related personal characteristics, including but not limited to gender, sexual orientation, gender identity or expression, national origin, age, physical or mental ability, race, ethnicity, political beliefs, or religious affiliation.

We expect all Employees to conduct themselves in a professional and inclusive manner at all times. Our zero-tolerance policy applies to any form of Discrimination, Harassment, or Bullying in the Workplace.

This Policy also extends to interactions with Third Parties engaging with Groups 's Employees or conducting work on behalf of the one of the Capital Group companies.

We adopt a zero-tolerance policy towards any form of Discrimination, Harassment or Bullying in the Workplace.

7. REPORTING INAPPROPRIATE CONDUCT

Group promotes an open-door policy strongly encouraging internal communication.

Therefore, whenever an Employee believes that there has been any breach of this Policy, they may report such events in complete transparency to their direct supervisor or, alternatively, to assigned individual who is a member of the FamiCord AG Capital Group International Compliance Team in the given country or the local Human Resources Department.

However, the FamiCord AG Group recognizes that addressing certain issues may be challenging. To facilitate transparent reporting, the Group provides multiple channels of communication, accessible to both Employees and external stakeholders (e.g., clients, collaborators, agents, commercial partners, suppliers, shareholders, etc.). In certain subsidiaries of the Group, where required by law, whistleblowers are allowed to choose whether to disclose their identity or remain anonymous.

Reports made in good faith, even if subsequently found to be unsubstantiated, will not be subject to disciplinary action. Likewise, any intentionally false report or information will be deemed to constitute a violation of the present Policy and disciplinary sanctions will be applied, as appropriate.

How to make a report – Channels of communication:

- 1. The online Whistleblowing portal, accessible <u>in some</u> Group companies, the address can be reached through the company's Intranet page;
- 2. Emails to the following address: compliance@pbkm.pl
- Regular mails to the following address:
 Polski Bank Komórek Macierzystych sp. zo.o.
 Dobrosława Waleczek-Gaudnik- Leader Compliance Expertise Centre Al. Jana Pawła II 29
 00-867 Warsaw
 Poland

Prohibition of retaliation

The FamiCord AG Group strictly prohibits threats or any form of retaliation of any kind against any individuals because they report conduct reasonably believed to violate this Policy, or in good faith provide information in connection with a report or investigation of any such conduct. Any individual who retaliates or attempts to retaliate against anyone involved in an investigation related to breach of this Policy, including by pressuring, or threatening the complainant, will be subjected to disciplinary action, as described in point 8 "Consequences".

8. CONSEQUENCES

Any Employee who violates this Policy by engaging in Discrimination, Harassment, Bullying, or any other prohibited behaviour will face appropriate disciplinary measures, up to and including termination of employment, in accordance with the local laws applicable to the respective Group entity, as well as any relevant international regulations where applicable.

In addition, violations of provisions related to Discrimination, Harassment, violence, threats, abuse of authority, or any similar misconduct by a Third Party, may constitute a significant breach of contractual obligations. Such violations could result in the termination of the contractual relationship and, where permissible by law, a claim for damages by the Group.