



# Human Rights Protection Policy **in the Electrum Group**

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## 1. Introduction

This Human Rights Policy is of fundamental importance to the sustainable development of the Electrum Group and the communities in which we operate. It defines principles aimed at ensuring respect for human rights throughout all processes, within the organization, and in relations with external stakeholders.

Respect for human rights within the Electrum Group is based on principles defined in internal regulations, national legal frameworks, and international standards and recommendations, in particular in accordance with:

- The Universal Declaration of Human Rights;
- The International Labour Organization Declaration on Fundamental Principles and Rights at Work;
- The United Nations Global Compact;
- The UN Guiding Principles on Business and Human Rights;
- The OECD Guidelines for Multinational Enterprises;
- The International Covenant on Civil and Political Rights;
- The International Covenant on Economic, Social and Cultural Rights;
- The International Labour Organization Declaration on Fundamental Principles and Rights at Work referring to the eight core ILO conventions: Nos. 29, 87, 98, 100, 105, 111, 138, and 182.

We respect the human rights of individuals employed by the Electrum Group, its collaborators, and all other persons performing work for the Electrum Group, directly or indirectly. We implement solutions aimed at ensuring safe and healthy working conditions, preventing workplace bullying and discrimination, upholding the principle of equal treatment, and ensuring respect for all other rights. We are committed to systematically promoting human rights and providing education in this area.

## 2. Business Partners

The Electrum Group promotes human rights in its relations with suppliers, subcontractors, and other business partners. We expect our business partners to, in all their business activities, respect the rights and freedoms of the persons they employ and conduct their operations in accordance with the highest standards of business ethics throughout their value chains. A prerequisite for cooperation with suppliers is their adherence to the principles set out in the "Business Partners Code of Conduct". Accordingly, where the Code provides for a higher standard of business ethics than is required by national statutory or executive regulations, the principles of the Code shall apply. Osoby świadczące pracę na rzecz Grupy Electrum

### 1. Promoting Diversity

At the Electrum Group, we value the diversity of our employees and the contribution they bring to our organization. We promote values aimed at fostering an atmosphere of acceptance, understanding, and tolerance. We create the conditions for an open and safe workplace so that every employee can fully realize their potential.

Our goal is an inclusive work environment, free from discrimination or harassment on the grounds of race, gender, skin color, nationality, religion, age, social background, disability, sexual orientation, and marital status. We respect the right of employees to freely express their views on matters that concern them, while fully upholding the right to privacy and refraining from interference in personal and family matters. Relationships within the organization — both among employees and between employees and their supervisors — are built on mutual respect and trust. These same principles guide our relations with business partners.

## 2. Health and Safety at Work

Maintaining a safe and healthy work environment and complying with all relevant health and safety laws and regulations is an essential element of our organizational culture and an expression of our commitment to fundamental human rights. We provide training and resources to our employees so they can perform their work safely and effectively. We equip them with the knowledge and skills necessary to identify and avoid potential hazards, enabling them to carry out their duties more safely and efficiently. We ensure access to appropriate safety equipment and resources — such as personal protective equipment and emergency response plans — to further reduce the risk of accidents and injuries. We regularly review and improve our health and safety policies and practices to ensure they remain in continuous compliance with applicable law and maintain the required level of safety and quality of work.

## 3. Equal Treatment in Employment

At the Electrum Group, employees are treated equally with regard to the establishment and termination of employment, terms and conditions of employment, promotion, and access to vocational training — regardless of the form or duration of employment. Employees are entitled to equal remuneration for the same work or work of equal value.

Recruitment and remuneration policies are shaped in accordance with the highest standards to ensure appropriate and dignified working conditions. Employees are entitled to annual paid leave, the duration and terms of which are governed by national regulations. Within the Electrum Group, working time is recorded and settled in accordance with applicable law and internal procedures.

## 4. Employee Well-being

At the Electrum Group, we take a holistic approach to the individual and to meeting their diverse needs. This encompasses, among other things, a sense of security, the realization of one's potential, the ability to cope with stress, the development of mental resilience, a sense of happiness and life satisfaction, and maintaining a healthy work-life balance.

The programs we have implemented within the Electrum Group include: supplementary private medical care, the Company Social Benefits Fund, a co-financing contribution towards the Multisport card, a subsidy towards the purchase of corrective glasses or contact lenses, additional employee insurance, and the opportunity to participate in webinars on physical and mental health.

## 5. Child Labour and Forced Labour

The Electrum Group, in accordance with the conventions of the International Labour Organization, does not employ children and does not cooperate with entities that make use of child labour. We do not accept any form of forced labour, human trafficking, or modern slavery. All employees have the right to freely enter into and terminate an employment relationship in accordance with applicable national regulations.

The Electrum Group does not require employees to deposit identity documents or money as a condition of employment, and does not tolerate such practices on the part of its contractors.

## 6. Reporting and Investigation of Irregularities

At the Electrum Group, we treat every employee with due respect and ensure that each individual receives personal support. Guided by our commitment to the protection of human rights, the Electrum Group has implemented a whistleblowing policy that enables employees and stakeholders to report any unethical conduct, violations of law, or regulatory breaches — without fear of retaliation of any kind.

We believe that such measures promote the early identification and resolution of potential issues before they escalate in a way that could harm employees, the company's reputation, or its financial performance. This policy reflects our commitment to ethical conduct and transparency, strengthening trust and credibility among stakeholders.

The adopted framework covers all employees of the Electrum Group as well as external stakeholders — individuals who cooperate with the Electrum Group, whether directly or indirectly.

Reports are received and reviewed by a dedicated team of specialists from QHSSE Audit & Compliance and Human Resources. Each case is thoroughly investigated and objectively assessed.

Irregularities may be reported to the dedicated email address: [SpeakUp@electrum.pl](mailto:SpeakUp@electrum.pl) or by post: Electrum sp. z o.o., ul. Watykańska 13, 15-638 Białystok.

### 3. Review and Monitoring

Given the evolving nature of human rights risks over time, the development of the company's operations, and the context in which the Electrum Group operates, the analysis of internal documents and procedures is an ongoing process. We are aware that, as our practices develop, the indicators relevant to us may change or be subject to further refinement. This policy will therefore be periodically reviewed and updated as necessary.

The effectiveness of these activities is coordinated and overseen by the Head of QHSSE Audit & Compliance and the Head of HR & Payroll.

### 4. Communication and Development

This Human Rights Policy is publicly available on the website [www.electrum.pl](http://www.electrum.pl) in both Polish and English. Its implementation is supported by communication activities conducted both within the Electrum Group and throughout our value chain. Information about the policy also forms part of training programs aimed at building awareness and sensitivity with regard to respect for human rights.

### 5. Related Documents

Within the Electrum Group, expectations concerning human rights are also reflected in the following documents:

- Code of Conduct of the Electrum Group
- Work Rules and Regulations
- Remuneration policy
- Code of Conduct for Business Partners of the Electrum Group
- Equality and diversity policy at Electrum