

# **ANTI-MOBING AND ANTI-DISCRIMINATION POLICY**

„BALMA” SA Furniture Factory

Fabryka Mebli Balma SA respects the personal dignity, privacy, and personal rights of all employees. The company is committed to combating all forms of unethical behaviour, particularly mobbing and discrimination in the workplace.

Employers, their representatives, and employees are prohibited from:

- engaging in mobbing behaviours towards others,
- discriminating against individuals, particularly on the basis of their origin, nationality, religion, race, gender, age, or sexual orientation,
- harassing in any form, verbal or physical, on the basis of the above or other circumstances,
- acting in a manner that violates accepted social norms, especially the principles established in the Code of Conduct of Fabryka Mebli Balma SA.

If you have witnessed unethical behaviour or believe that the above prohibitions are not being observed in your workplace, you should report the situation to your immediate supervisor, the Head of the HR, Payroll and Administration Department, or the CEO.

Tarnowo Podgórze, 1 August 2024

## General Provisions

### §1

In compliance with the obligation arising from Article 943 § 1 of the Labour Code Act of 26 June 1974 (Journal of Laws of 2019, item 1040, as amended, Article 943 § 44 amended by Article 1 point 6 of the Act of 16 May 2019 (Journal of Laws 2019, item 1043) amending this Act on 7 September 2019), and in order to establish workplace principles of social coexistence, including the prevention of mobbing, discrimination, and unequal treatment in employment, Fabryka Mebli Balma SA, located at ul. Poznańska 167, 62-080 Tarnowo Podgórne (hereinafter referred to as the "employer"), introduces this Anti-Mobbing and Anti-Discrimination Procedure (hereinafter referred to as the "Procedure"). All employees and associates employed by the employer (hereinafter referred to as "employees") are required to become familiar with its content and comply with it strictly.

The terms used in the Procedure are defined as follows:

**1. Labour Code** – the Act of 26 June 1974, Labour Code (Journal of Laws of 2019, item 1040, as amended, Article 943 § 44 amended by Article 1 point 6 of the Act of 16 May 2019 (Journal of Laws 2019, item 1043) amending this Act on 7 September 2019).

**2. Mobbing** – actions or behaviours related to an employee or directed against an employee, involving persistent and long-term harassment or intimidation of the employee, which result in a lowered assessment of their professional usefulness, aimed at humiliating, ridiculing, isolating, or eliminating them from the team of colleagues.

**3. Discrimination** – unethical actions towards an individual or a specific group of individuals, directly or indirectly related to employment conditions, promotion, and access to training for professional development, particularly based on gender, age, disability, race, religion, nationality, political beliefs, union affiliation, ethnic origin, creed, sexual orientation, as well as based on employment for a fixed or indefinite term, full-time or part-time. This includes:

**harassment** – unwanted behaviour that constitutes a form of discrimination, with the purpose or effect of violating an employee's dignity and creating an intimidating, hostile, degrading, humiliating, or offensive atmosphere towards them;

**sexual harassment** – a form of discrimination based on gender, involving any unwanted conduct of a sexual nature or relating to the employee's gender, with the purpose or effect of violating the employee's dignity, particularly by creating an intimidating, hostile, degrading, humiliating, or offensive atmosphere. Such behaviour may include physical, verbal, or non-verbal elements.

**4. Other Unethical Actions** – any other behaviours that do not constitute mobbing or discrimination but violate the principles of social coexistence in the workplace, thereby infringing on the dignity or other personal rights of employees.

**5. Employee Relations Team** – a collegial body established at Fabryka Mebli Balma SA, responsible for analysing written reports of suspected mobbing and discrimination, recommending solutions to stop such behaviours, and preventing factors that may contribute to inappropriate workplace relationships, particularly mobbing and discrimination. The team is also tasked with suggesting methods to prevent such behaviours in the future.

**6. Employee** – any natural person who is in an employment relationship with the employer, as well as individuals cooperating with Fabryka Mebli Balma SA based on civil law contracts (including self-employed individuals).

**7. Employer** – represented by the Management Board of Balma.

**8. Complaint** – a report made to the employer in accordance with the Procedure in the event of suspected mobbing, discrimination, or other unethical behaviour.

## **Rights and Obligations of Employees and the Employer**

### **§2**

1. Fabryka Mebli Balma SA considers mobbing, discrimination, and unethical behaviours as unacceptable, reprehensible, and deserving of condemnation. Any manifestations of such behaviours will not be tolerated by the Employer.

2. The primary obligation to counteract mobbing and discrimination rests with Employees managing teams at all levels of management, as well as with the Head of the HR, Payroll, and Administration Department and the CEO.

### **§3**

1. The Employer is obligated to take all actions prescribed by law to prevent (counteract) mobbing and discrimination against Employees.

2. The Employer is obligated to take all legally prescribed actions aimed at eliminating the social effects of mobbing and discrimination, particularly by providing support to victims of such behaviours.

3. The Employer may implement the actions referred to in points 1-2 of this paragraph by using available, legally compliant sanctioning measures against the perpetrators of mobbing or discrimination.

### **§4**

1. Any employee who believes they have become a victim of mobbing or discrimination has the right to request that the employer take actions to stop these behaviours and eliminate their effects.

2. Any employee who has or receives information about signs of mobbing or discrimination should file a complaint.

3. Groundless accusations of mobbing or discrimination are prohibited and may result in actions as provided by law.

### **Counteracting Mobbing and Discrimination**

#### **§5**

1. The Employer actively works against mobbing and discrimination in the workplace and in relation to work, particularly by:

- taking preventive actions outlined in point 2 below, aimed at counteracting mobbing and discrimination,
- taking intervention actions to immediately stop behaviours that show signs of mobbing or discrimination,
- assisting individuals harmed by unethical behaviour and eliminating its symptoms in the workplace environment.

2. The Employer undertakes preventive actions, including:

- educating employees about these issues and how to counteract them,
- creating informational materials on preventing mobbing and discrimination and making them available to employees,
- ensuring honest communication,
- organising work appropriately,
- establishing clear rules for decision-making and conflict resolution,
- developing and promoting principles of social coexistence within the workplace,
- providing an email address: zglos@balma.pl, where questions related to mobbing or discrimination can be sent. These questions will be answered by direct supervisors, the Head of the HR, Payroll, and Administration Department, or the CEO,
- supporting attitudes that counteract mobbing and discrimination
- in the case of a written complaint regarding unethical behaviour, forming an Employee Relations Team dedicated to investigating the matter.

### **Complaint Regarding Mobbing or Discrimination**

#### **§6**

1. Every complaint should be submitted to the immediate supervisor, the Head of the HR, Payroll, and Administration Department, or the CEO in writing (by letter, email, or in person), with the handwritten or electronic signature of the person submitting the complaint. A template for the complaint is provided in Appendix No. 2 to this Procedure.

2. Anonymous submissions will not be considered.

3. Upon receiving a complaint that meets the requirements specified in point 1, an explanatory procedure will commence within 7 business days (counting from the day of the submission).

### **Employee Relations Team**

#### **§7**

1. To counteract and sanction mobbing and discrimination in the workplace, Balma establishes a permanent Employee Relations Committee.

2. A team is selected individually for each complaint, consisting of: the CEO, the Head of the HR, Payroll, and Administration Department, and the immediate supervisor.

3. The team is convened when incidents occur that require its action and when it is not possible to resolve the conflict informally.

The team composition is approved by the Management Board.

4. A person who has previously been the subject of an investigation by the team for unethical behaviour that could lead to mobbing or discrimination in the future cannot be a member of the Committee.

5. Members of the Committee:

- should be familiarised by the employer with the issues of mobbing and discrimination, as well as the principles of conducting explanatory proceedings,
- are obligated to comply with personal data protection regulations,
- are required to maintain confidentiality regarding any information obtained during the proceedings.

6. In situations involving escalated conflicts that require expert support in the fields of law or psychology, the employer has the right to appoint an external expert.

7. All recommendations made by the team must be in accordance with applicable legal regulations and the provisions of this Procedure.

### **Proceedings of the Employee Relations Committee**

#### **§8**

1. The Committee selected for a specific complaint holds meetings that are confidential in nature.

2. The Committee elects a chairperson and a deputy from among its members.

3. Meetings of the Committee are convened orally or in writing (e.g., by email) by the chairperson or, in the absence or inability of the chairperson, by the deputy

chairperson, either on their own initiative or at the request of a Committee member.

4. The Committee meeting takes place at the location specified in the notice mentioned in point 3.

5. A note is taken at each Committee meeting, and a final report is prepared, which is signed by all Committee members.

6. At the request of the chairperson, each employee is obliged to appear in person and provide explanations or information related to the case.

7. The Employer, at its own expense, provides the Committee with the resources (including materials and facilities) necessary to perform its tasks, with the decision on the scope and extent of the resources provided being solely at the discretion of the Employer.

### **Proceedings of the Employee Relations Committee**

#### **§9**

1. The Committee's task is to analyze the complaint in terms of conflicts and prepare recommendations for resolving the conflict(s) between the parties, as well as to formulate possible suggestions for actions to prevent the escalation of such conflicts in the future.

2. The Committee does not have the authority to determine whether the situation reported in the complaint to the Employer constitutes mobbing or discrimination, as such authority is granted exclusively to the courts.

3. The Committee is obliged to listen to the parties involved in the matter and allow them full freedom of expression.

4. Each member of the Committee is required to maintain objectivity and impartiality when analyzing the conflict situation.

5. If, during the proceedings, it becomes necessary to speak with witnesses, the chairperson will invite them to the meeting. The witness must also sign a confidentiality agreement regarding all facts and circumstances they learn of in connection with their participation in the Committee meeting.

### **Intervention Actions**

#### **§10**

1. During the proceedings, the Committee determines, in the form of recommendations, whether and what intervention actions (organizational or sanctioning) should be taken against the perpetrator(s) of the conflict or to support the complainant, in order to immediately stop actions that may cause mobbing or discrimination in the workplace or in relation to work in the future.

2. After concluding the proceedings, the Committee prepares a recommendation for resolving the situation, which is signed by all Committee members. This recommendation is a final document and requires a written justification, indicating the factual basis on which it was issued.

3. If the Committee finds that there are extreme unethical behaviours in the conflict situation that could lead to mobbing or discrimination in the future, the Committee recommends the application of sanctions as provided by relevant legal regulations.

4. The decision to implement and specify the type of actions recommended (organizational, disciplinary, or legal measures) against the perpetrator(s) of any unethical behaviour is made by the employer.

## Sanctions

### §11

Possible sanctions for individuals engaging in mobbing and failing to comply with the principles set out in the Procedure, the Code of Conduct of Fabryka Mebli Balma SA, and the Labour Code:

- warning,
- reprimand,
- termination of employment with notice,
- termination of employment without notice,
- revocation of employee privileges,
- holding the individual financially liable for damages caused in connection with mobbing.

## Final Provisions

### §12

1. All individuals involved in the work of the Employee Relations Committee (including the members themselves) are required to maintain confidentiality regarding all facts learned during and prior to the Committee's work, related to specific reports of situations that may involve mobbing or discrimination.

2. Committee members are not allowed to copy for distribution, or in any way share or disseminate, documents related to the case of mobbing or discrimination under review.

3. The information contained in the Committee's materials and documents may include personal data and is subject to protection as provided for personal data protection.

### §13

1. The Employer is required to acquaint every employee and newly hired employee with the content of this Policy before allowing them to start work (i.e., before the actual commencement of their work duties).



2. After reviewing the Policy, the employee must submit and sign a statement confirming that they have read its content.

#### **§14**

1. Once a year, the Employer analyses and assesses whether the provisions of the Policy are being properly implemented.

2. Any changes to the Policy are made by the Employer through an appropriate order.

3. The Policy comes into effect on the date it is announced by the Employer.

4. To facilitate employees' familiarisation with the Policy, the Employer will provide a paper copy whenever an employee requests one from the Head of the HR, Payroll, and Administration Department.

5. The Policy is introduced for an indefinite period.