

POLICY OF RESPECTING AND PROTECTING HUMAN RIGHTS OF FABRYKA KART TREFL-KRAKÓW SP. Z O.O. of 17 May 2023

1. Definitions

Wherever in the Policy of Human Rights the following terms are used:

- 1) "Fabryka Kart Trefl-Kraków" or "we" – it shall be understood to mean the company operating under the business name of Fabryka Kart Trefl-Kraków sp. z o.o. with its registered office in Podłęże, Podłęże 650 (National Court Register: 0000071800) and
 - a) all entities with personal or capital ties with Fabryka Kart Trefl-Kraków,
 - b) all entities that are members of the capital group Fabryka Kart Trefl-Kraków within the meaning of Art. 4 point 14 of the Act of 16 February 2007 on Competition and Consumer Protection (consolidated text Dz. U. of 2021 item 275 as amended), to which it belongs, which forms or will form in the future Fabryka Kart Trefl-Kraków,
 - c) all members of the bodies or shareholders of Fabryka Kart Trefl-Kraków or entities related to them as specified in letter a) or b);
- 2) "Contractor" – it shall be understood to mean all natural or legal persons, linked with Fabryka Kart Trefl-Kraków by any legal relationship connected with the exercise of economic activity by Fabryka Kart Trefl-Kraków;
- 3) "Staff" – it shall be understood to mean persons that remain in an employment relationship with Fabryka Kart Trefl-Kraków that organizationally remain in the structure of Fabryka Kart Trefl-Kraków or are related to it in any way, as well as persons that cooperate with Fabryka Kart Trefl-Kraków under any civil law relationships, in particular service contracts, contracts of mandate or contracts for specific work, not excluding persons conducting economic activity;
- 4) "Policy of Human Rights" – it shall be understood to mean this Policy of Human Rights with all of its amendments.

2. General provisions

1. The Policy of Human Rights sets out the stance of Fabryka Kart Trefl-Kraków on the issue of respecting and protecting human rights. We are aware of the importance of the respect for human rights in the modern world.
2. The Policy of Human Rights complements the principles of our operations set out in other internal documents of Fabryka Kart Trefl-Kraków, such as the Code of Ethics, the Anti-corruption Policy and the Anti-mobbing Policy.

3. International sources of human rights protection

1. Fabryka Kart Trefl-Kraków assumes the responsibility for respecting and protecting of any recognized international human rights as part of our activities.
2. The Policy of Human Rights is based in particular on the principles formulated in:
 - 1) The International Charter of Human Rights (Universal Declaration of Human Rights, International Covenant on Civil and Political Rights with additional protocols on individual notifications and on the death penalty and International Covenant on Economic, Social and Cultural Rights),
 - 2) The Declaration of the International Labor Organization on Fundamental Principles and Rights at Work,
 - 3) The UN Guiding Principles on Business and Human Rights,
 - 4) The OECD Guidelines for Multinational Enterprises,
 - 5) The UN Global Compact Initiative.

4. Scope of application

1. The Policy of Human Rights applies to Fabryka Kart Trefl-Kraków and all members of its Staff.
2. Fabryka Kart Trefl-Kraków cares about promoting values and principles that aim to create conditions

for the workplace with respect for human rights. We respect human rights of members of our Staff. We ensure appropriate conditions of cooperation to raise awareness of the role which the respecting and protecting of human rights plays in the workplace. We foster a working environment free from all forms of violence, harassment, exploitation, intimidation and all forms of undesirable behaviors.

3. Fabryka Kart Trefl-Kraków recognizes the right of employees to unionize and bargain collectively.

5. Compliance with conditions of employment and health and safety rules

1. Fabryka Kart Trefl-Kraków strives to offer the Staff competitive wages on the basis of market conditions and nature of our industry, ensuring commensurate remunerations for each member of the Staff.

2. We comply with conditions of employment in the light of generally applicable provisions of law, including provisions concerning working time and overtime work.

3. Fabryka Kart Trefl-Kraków ensures safe and hygienic working conditions in the interest of all members of the Staff in accordance with generally applicable provisions of law. We constantly monitor and identify potential threats in order to update our health and safety guidelines and instructions.

6. Equal treatment and counteracting discrimination

1. Fabryka Kart Trefl-Kraków guarantees equal treatment as regards the establishment, duration and termination of an employment relationship.

2. We create an open and tolerant working environment, in an atmosphere of mutual respect and acceptance.

3. We do not tolerate any cases of discrimination in particular on grounds of gender, age, disability, race, religion, nationality, political beliefs, trade union membership, ethnic origin, confession, sexual orientation, form of employment.

7. Employment of children

Fabryka Kart Trefl-Kraków firmly opposes the employment or other engagement as Staff of children, i.e. persons who in the light of generally applicable law have not reached the age that allows them to take up employment and provides appropriate procedures that prevent their employment. Fabryka Kart Trefl-Kraków applies procedures of due diligence in the supply chain in order to prevent indirect use of child labor.

8. Forced labor, human trafficking and all forms of modern slavery

Fabryka Kart Trefl-Kraków firmly opposes forced labor, human trafficking and all forms of modern slavery and provide appropriate procedures that allow the reporting and handling of such cases. Fabryka Kart Trefl-Kraków applies procedures of due diligence in the supply chain to prevent indirect profiting off or promoting of such illegal activities.

9. Contractors and local community

1. The respecting and protecting of human rights underpins our activities in all their aspects. Fabryka Kart Trefl-Kraków adjusts the rules of cooperation with all its Contractors to the principles of the Policy of Human Rights. The Policy of Human Rights forms an integral part of legal relationships entered into with Contractors. We declare that the observance of human rights is an important factor taken into account by us when establishing mutual relations. We promote the importance of the respecting of human rights and we expect our Contractors to observe them.

2. Fabryka Kart Trefl-Kraków engages in an open dialogue in local communities everywhere where this has an impact on our activities

10. Reporting of irregularities

1. Fabryka Kart Trefl-Kraków has implemented procedures of due diligence, to effectively monitor the risk of possible human rights violations within the organizational structure, as well as in the entire supply chain and procedures of undertaking appropriate interventions. Anyone who violates the Policy of Human Rights incurs any possible consequences provided for by law.
2. Fabryka Kart Trefl-Kraków provides the Staff with open communication within the organizational structure. We have implemented procedures that provide the possibility of reporting irregularities as regards the principles of respecting and protecting human rights while respecting the confidentiality of the report. Fabryka Kart Trefl-Kraków shall be obliged to examine the reports and undertake all necessary measures to counteract and eliminate human rights violations. Thanks to implemented procedures, we also have the possibility to effectively counteract similar phenomena in the future.

11. Change of the Policy of Human Rights

Fabryka Kart Trefl-Kraków shall assess the Policy of Human Rights to keep it up to date. Fabryka Kart Trefl-Kraków reserves the rights to change the Policy of Human Rights.

Podtęże, dnia 17.05.2023 r.

CEO
Jan Polak