
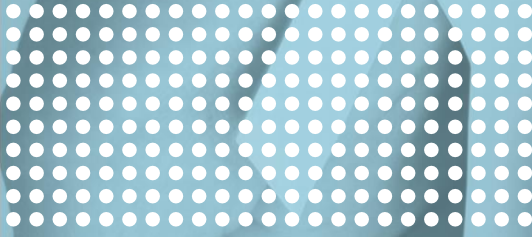


ProService Finteco's Policy on the Protection of Human Rights



Respecting and upholding human rights, including labour rights and the rights of employees in the value chain, is a key and integral part of responsible business and sustainable development. This is manifested not only in compliance with generally applicable laws, guidelines, conventions or international declarations on human and labour rights, but also in the development of internal regulations and policies that meet these standards, the shaping of a corporate culture based on ethical and lawful conduct, and the establishment of proper models and attitudes in the business environment. The above measures are aimed at respecting human rights, including the rights of employees of ProService Finteco sp. z o. o. (hereinafter referred to also as ProService Finteco, the Company) and employees in the value chain, as well as eliminating discrimination, promoting equal opportunities and other ways of promoting diversity and inclusion.

At ProService Finteco, we understand that a socially responsible entrepreneur is one who complies with the law, respects human rights, including labour rights, and engages in dialogue and cooperation with people employed both within their own workforce and throughout their value chain. Based on regular risk analyses, the Company implements measures to prevent and minimise its negative impact on the environment and enables the application of corrective measures in the area of human rights.

ProService Finteco undertakes to conduct its business in a responsible manner and with full respect for human rights, including labour rights, drawing on the achievements of international organisations as set out in:

- The Universal Declaration of Human Rights;
- The International Covenant on Civil and Political Rights;
- The International Covenant on Economic, Social and Cultural Rights;
- The OECD Guidelines for Multinational Enterprises;
- The UN Guiding Principles on Business and Human Rights;
- The International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, as expressed in the relevant ILO conventions;

and in particular: employee rights, equal opportunities in employment, rights to privacy, freedom of expression and peaceful assembly, the right to association, as well as counteracting discrimination and mobbing in the sphere of employment, social exclusion and increasing diversity.



ProService Finteco declares that:

- it implements a human rights due diligence process, including cooperation with its own employees and employees in the value chain, in order to identify the actual or potential negative impact of the Company on human rights and takes appropriate measures to minimise and prevent negative impact;
- it implements and improves procedures and solutions enabling remedial and preventive measures to be taken against negative impacts;
- it analyses the effectiveness of the measures implemented with a view to making any necessary improvements and ensuring their compliance with the international legal acts mentioned above.



ProService Finteco's Policy on Respecting Human Rights, including labour rights, is dispersed and, apart from the Policy on managing sustainability issues, is included in documents such as:

- The Code of Ethics of ProService Finteco sp. z o.o. together with the Rules of Procedure of the Ethics Committee;
- The General Policy on Preventing Harassment and Discrimination;
- The Code of Conduct for Suppliers;
- Work Regulations;
- Workplace Accident Prevention Policy;
- The Policy on Preventing Discrimination, Promoting Equal Opportunities and Other Ways of Increasing Diversity and Social Inclusion;
- The Procedure for Reporting Violations of the Law and Taking Follow-up Action;
- Recruitment Instructions;
- The Instructions for Employment and Termination of Cooperation;
- Remuneration Policy;
- Periodic Assessment System;
- The Rules for Awarding Financial and Non-Financial Rewards to Employees;
- Training Procedure.

Issues relating to forced labour and child labour arise directly from the provisions of the above-mentioned legal acts, as well as the Constitution of the Republic of Poland of 2 April 1997 and the provisions of the Labour Code of 26 June 1974, therefore it is not necessary to repeat them in the internal documents of ProService Finteco sp. z o.o.

ProService Finteco's practical activities in the field of human rights, including labour rights and employee rights in the value chain

ProService Finteco's active participation and support for activities promoting sustainable and socially responsible attitudes is reflected in:

- joining the United Nations Global Compact, i.e. an organisation bringing together entities cooperating with the UN and developing strategies and activities based on UN policies, in particular on the Sustainable Development Goals and the Ten Principles of the United Nations Global Compact concerning four areas: human rights, labour standards, environmental protection, and anti-corruption;
- signing by the Company of the Diversity and Inclusion Declaration of the Association of Business Service Leaders (ABSL), obliging organisations to be guided in their activities by the principle of equal treatment in the workplace, regardless of nationality, disability, sexual orientation, gender, ethnic origin, political beliefs, race, religion, gender identity, age, creed, form of employment, as well as other grounds vulnerable to exclusionary behaviour, codifying values important to the Company and universal ethical principles in an internal Code of Ethics, as well as a policy for preventing discrimination, promoting equal opportunities and other ways of increasing diversity and social inclusion, and creating a dedicated channel for reporting any violations of the Code and managing them;
- implementing channels for reporting other types of violations, including reports of legal violations;
- engaging and encouraging business partners to engage in dialogue on human rights issues.

The Company undertakes and intends to continue undertaking further initiatives and activities promoting socially responsible attitudes, such as volunteering, employee training in human rights aimed at raising awareness among employees, and activities supporting health care and high quality of life.

The Company undertakes to regularly review and update this Policy to ensure its compliance with applicable standards and regulations in the field of human rights protection.

