

Human Rights Policy



AMICA GROUP

Table of contents:

1. Introduction.....	1
2. Definitions.....	1
3. Human Rights Policy – Background Information.....	2
4. Care for human rights in relation to Employees	2
5. Detailed rules of the Amica Group regarding respect and protection of human rights in the supply chain and relations with stakeholders.....	3
7. Corrective actions and access to remedies.....	3
8. Final provisions.....	4

*The foundation of responsible business
respect for human rights*

Version 1

Effective from December 12, 2025

1. Introduction

The Amica Capital Group is guided by the principle of respect for dignity and human rights in all areas of its operations. We recognize that respect for human rights is the foundation of responsible business and a prerequisite for building lasting relationships with Employees, Business Partners, Customers and the communities in which we operate.

We want all activities of the Amica Capital Group to be conducted in an ethical, transparent manner and in accordance with applicable law and best practices in the field of human rights.

To this end, the companies from the Amica Group decided to adopt a Human Rights Policy.

2. Definitions

- **Amica Group/"We"** – the parent company, i.e. Amica S.A. with its registered office in Wronki (Poland) and its subsidiaries, included in the consolidated financial statements, listed in the consolidated financial statements,
- **Compliance Unit** – a Compliance Unit operating in Amica S.A. within the Corporate Governance & Regulatory Affairs Department,
- **Business Partner** – a supplier, recipient or any entity cooperating with the Amica Group in any scope and form,
- **Human Rights Policy/Policy** – this document,
- **Employee** – any natural person working for the Amica Group, regardless of the type of contract concluded and the position held (including persons cooperating with the Amica Group on the basis of civil/b2b contracts and persons employed under managerial contracts),
- **Company** - any company that is part of the Amica Group.

3. Basic information

The policy has been developed on the basis of international standards, including:

- ✓ the International Charter of Human Rights;
- ✓ the Universal Declaration of Human Rights;
- ✓ the European Convention on Human Rights;
- ✓ the International Labour Organization's Declaration on Fundamental Principles and Rights at Work,
- ✓ United Nations Guiding Principles on Business and Human Rights,
- ✓ The ten principles of the United Nations Global Compact,
- ✓ The Economic and Development Organization (OECD) Guidelines for Multinational Enterprises,
- ✓ Local employment laws applicable to our Companies.

With regard to the above norms and regulations, the concept of **human rights is understood by the Amica Capital Group in particular as internationally recognized standards, freedoms and rights, the central value of which is the dignity of every person**, regardless of their origin, gender, age, religion or political beliefs.

Taking into account the above legal regulations and the principles of respect for human rights, **the Amica Group has adopted a set of norms, standards and principles collected in this document as well as other policies and procedures** that guide it in conducting its business. These values are also in line with our business and sustainability strategy.



The Human Rights Policy applies to all Employees of companies from the Amica Group. The Amica Group strives to ensure that these principles are also observed by its Business Partners.

4. Care for human rights in relation to Employees

Diversity, equal opportunities and inclusivity



We promote ethical principles and norms that contribute to the acceptance and deepening of diversity in the organization. It is important to promote equal opportunities for every Employee regardless of gender, age, disability, ethnic, national or social origin, religious beliefs, trade union or political affiliation. One important element of our commitment is to ensure inclusivity by creating a work environment that builds a culture of openness and eliminates barriers.

Freedom of association and cooperation with the social side



The Amica Capital Group provides its Employees with the right to freely associate within employee organizations and to conduct a dialogue with the social side. We guarantee respect for freedom of expression, the right to trade union activity, to conclude collective agreements and the protection of employee representatives, in accordance with applicable regulations.

Occupational health and safety



We consider the health and safety of our employees to be a superior value. We care about ensuring a safe working environment, including occupational hygiene, not only complying with applicable legal regulations, but also conducting many educational and information programs. We undertake a number of initiatives to improve work safety.

Decent employment conditions and well-being of employees



We offer our Employees fair remuneration based on the applicable law. It is important for us to respect workers' rights. We care about the well-being and health of our employees – we carry out many health prevention campaigns and programs such as psychological support and a diverse package within the social benefits fund. Our goal is to support work-life balance.

Prevention of child labour and forced labour



At the Amica Group, we do not allow the employment of children who have not reached the age of entry into employment in accordance with the applicable legal regulations. We do not accept forced labor, human trafficking, and any other form of modern slavery.



Prohibition of mobbing, discrimination and any other irregularities in the workplace

We build an organizational culture free of intimidation, threats or any kind of mental or physical violence. We do not accept any actions aimed at violating human dignity, including mobbing, discrimination, violence or harassment of any kind. Fundamental values and principles of conduct, which are the basis for building ethical standards and shaping appropriate attitudes among employees, have been implemented in all companies of the Amica Capital Group.

5. Detailed rules of the Amica Group regarding respect and protection of human rights in the supply chain and relations with stakeholders

We expect all Business Partners to comply with applicable laws, ethical principles and international human rights standards. In particular, we require that the entities we work with respect human rights in all areas of their activities.



Respect for human rights is an important criterion when establishing and maintaining business relationships.

Business Partners are obliged to comply with the rules and regulations set out in detail in **the Code of Business Conduct**, which remain consistent with the Human Rights Policy of the Amica Group.

6. Reporting violations

Any cases of violations of the Human Rights Policy of the Amica Group should be reported in accordance with the applicable reporting channels specified in the Code of Ethics.

Events or any irregularities can be reported to the e-mail address **ethics@amica.com.pl**.

At the same time, taking care of the highest standard of ensuring confidentiality and comfort of the whistleblower, we introduce the possibility of complete anonymity by reporting via the platform: **report.whistleb.com/pl/amica**.

The solutions regarding the manner of reporting violations specified above include the Group's Employees, external stakeholders, including the Companies' Business Partners.

7. Corrective actions and access to remedies

The Amica Capital Group, guided by the OECD Due Diligence Guidelines, undertakes to take appropriate corrective actions in the event of a negative impact on human rights.

The type of remedial action taken is determined each time by the nature and extent of the negative effects. The assessment of the necessity of carrying out activities is based on the following categorisation of the causes of negative effects, which can take three forms:

1. be caused by the Amica Capital Group;
2. to which the Amica Capital Group contributed;
3. directly related to the activities of the Amica Capital Group, its products or services through business relationships.

In each case, the Amica Capital Group will take actions adequate to the role and degree of responsibility:

- **in the event of an effect** – the Amica Group will implement corrective measures and actions to restore compensation to the persons injured as a result of the negative effects of the state in which they were before their occurrence, as well as to take proportionate remedial measures;
- **in the case of contributing** , to stop or prevent contributing to the negative impact and to cooperate to eliminate or mitigate the remaining negative impacts;
- **in the case of binding through business relationships** – actively influencing partners and supporting corrective actions.

We are committed to ensuring that all individuals and communities whose human rights may be violated have access to effective, transparent and understandable reporting mechanisms and appropriate remedies. **Our goal is** not only to respond to existing violations, but also to **create an organizational culture based on respect for human rights and the responsibility to protect them.**

Based on the due diligence process implemented in the Amica Group , **we monitor the effectiveness of actions and verify whether the steps taken have led to a lasting improvement.**

8. Final provisions

The compliance unit is obliged to periodically review (at least once every three years) and update the Policy in order to adapt it to the applicable legal regulations, best corporate practices and the specifics of the Amica Group's operations.

In the event of a conflict between the provisions of the Policy and the applicable law, the provisions of law shall prevail. The Amica Group strives to apply the highest standards of human rights protection.

The Compliance Unit is responsible for the implementation and maintenance of the Policy, but each employee is obliged to comply with the principles described in the Policy.



Contact with the compliance unit of the Amica Group:
compliance@amica.com.pl

Owner:	Corporate Governance & Regulatory Affairs Director	
Accepted	Management Board of Amica S.A.	
Policy Areas	All areas of the Amica Group	
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