



HUMAN AND EMPLOYEE
RIGHTS POLICY IN ONDE S.A.

As ONDE S.A., we conduct operations respecting rights and dignity of all people and observing all current legislation. ONDE S.A. undertakes to observe provisions of the United Nations Universal Declaration of Human Rights and the Universal Declaration of Human Rights, concerning fundamental rules and rights at a workplace.

Our activities are conducted in an honest and transparent way, taking into account human rights and interests of our employees. We respect all human rights that are recognised on the international level and concern our operations.

We expect our business partners to observe rules that are consistent and coherent with those followed by ONDE S.A. We forbid discrimination, forced, illegal or child labour, as well as undertake to ensure safe and healthy work conditions and to respect dignity of every human being. We ensure freedom of association and a possibility to conclude collective labour agreements. We expect the same from all our subcontractors and suppliers, and we do not accept any breach of human and/or employee rights, in any form. We do not undertake or continue cooperation with entities that do not respect human and/or employee rights. For us, they are the most important thing.

We undertake actions that help us to identify and react to situations that do or may adversely influence human rights as a part of ONDE S.A. activities or business relations. We undertake actions on the basis of identified facts and circumstances, monitor remedy activities, and inform our stakeholders about our responses.

ONDE S.A. implements mechanisms enabling reporting of breaches of any kind, as well as ensuring effective remedies in the case of any breach of human rights. We strive to improve awareness of our employees concerning human rights, including the labour law, by organising training sessions, informing about reporting methods, and assuring them there is no risk of any retribution against them.





NO DISCRIMINATION

We do not accept or tolerate any forms of discrimination of employees due to their race, skin colour, sex, language spoken, religion, political views, world view, labour union membership, sexual orientation, health, age, disability, or any other characteristics.

All decisions associated with employment, starting with recruitment, through promotions, training, up to termination of an employment agreement or retirement, are based solely on objective criteria - qualifications, skills, experience, meeting requirements associated with a specific position, and results achieved.

At ONDE S.A., we do not tolerate or allow employment of children below 15 years of age, in accordance with relevant legislation. At ONDE S.A. we do not employ people below 18 years of age to perform works that are hazardous or pose a hazard to their health, safety, or morality.



EMPLOYMENT OF CHILDREN AND MINORS



FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

At ONDE S.A., we respect and observe rights of our employees to (or not to) form or join labour unions or other organisations selected by them, and to collective bargaining concerning their common interests, without any threat of repressions, bullying, harassing, or termination of their employment agreement.

In all issues of importance for employees, we strive to conduct productive dialogue in good faith with representatives of legally established social partners.

At ONDE S.A., we observe all current legislation and industrial standards concerning remuneration and salaries, working time, overtime, and additional benefits.

Employees work in accordance with current working time standards. Remuneration for overtime is paid on a regular basis. We do not deduce any amounts from remuneration as a disciplinary financial penalty. Employees have a right to at least one day off work a week, and a right to sufficient breaks in working time, as well as to rest between shifts that is sufficient and conforms to current legislation. ONDE S.A. strives to influence continuous development of employees' skills and abilities, and to ensure for them options for development of their professional career, for example, by providing regular industry-based training sessions.



WORKING HOURS, BENEFITS, AND REMUNERATION





HOLIDAY AND LEAVES

ONDE S.A. forbids forced labour, in any form, including slave or semi-slave labour, or labour associated with human trafficking.

Employees have a right to move freely, and to leave their workstation at the end of their shift.

ONDE S.A. enables all employees to use their right to a sick leave, holiday, extended parental leave, leave to care for newborn children, own or adopted, in accordance with current legislation. People using the above-mentioned parental leaves are not at a risk of being dismissed, and they can return to their position with unchanged terms and conditions of their remuneration and benefits.



FORCED LABOUR



BULLYING, REPRESSION, AND HARASSMENT

All ONDE S.A. employees conclude a written, clear, and legally binding employment agreement, conforming to the current legislation.

ONDE S.A. does not tolerate and strives to protect employees against any act of abuse or bullying of physical, verbal, sexual, or mental nature, ill-treatment, humiliation, or threats at work, both from other employees or superiors.



EMPLOYMENT AGREEMENTS



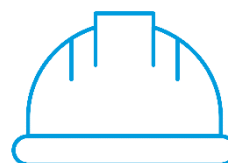
COOPERATION WITH PARTNERS/SUPPLIERS

Safety and health of our employees are our top priority.

ONDE S.A. cares for and provides a safe work place in accordance with current regulations concerning safety and protection of health, by implementing internal regulations and requirements in this area, to minimise a risk of accidents, injuries, and other hazards to health.

Together with employees, we strive to care for our work environment and place, and to continuously improve

We want to cooperate with business partners who share our obligations related to safety, ethics and conformance with regulations. We conclude agreements with partners and suppliers that require them to respect human rights in relation to services or supplies performed for ONDE S.A. - in accordance with obligations specified in this policy, and with a specific nature of individual services and supplies. We strive to use standard contractual clauses in this regard.



OCCUPATIONAL HEALTH AND SAFETY



them in terms of health and safety, by identifying possible hazards.

Scope of application

This policy applies to all ONDE S.A. employees and collaborators. Also rules of cooperation with suppliers are adopted to principles of this Policy.

Notification of the Policy violations

In accordance with this Policy, mechanisms of placing complaints provide for notifying and registering complaints, including those concerning human rights, and actions undertaken to handle them.

We want to create a place at which we value and respect open and honest communication within the organisation. This Policy is used to observe current labour laws and human rights in all areas of operations conducted by ONDE S.A.

ONDE S.A. is obliged to investigate violations, reply to employee concerns, and undertake appropriate remedial actions concerning violations.

Violations of the human rights and labour laws can be notified through channels for reporting violations established by ONDE S.A., which are designed and handled in a way ensuring protection and confidentiality for a reporting person, and confidentiality of a person whom the report concerns.

The report can be made:

- **by email**, by sending a report to: **zarzadnaruszenia@onde.pl** or **radanaruszenia@onde.pl** - when a person committing the violation of the Policy is a Member of the ONDE S.A. Management Board or other person having a conflict of interest with a Member of the ONDE S.A. Management Board; to ensure anonymity, reports made in this mode should be sent from an e-mail address making identification of the sender impossible. ONDE S.A. will not undertake any actions to identify the reporting person who decided to remain anonymous.
- **in a letter**, sent to: ONDE S.A. ul. Wapienna 40, 87-100 Toruń; to ensure anonymity, reports made in this mode should be sent with an annotation "A report of a violation of law - to be delivered directly to the addressee" on the envelope;
- **in person or by phone** to a Member of the Management Board appointed as a person responsible for receiving information about violations, at a telephone number (56) 612 25 10.

ONDE S.A. ensures that only the authorised people, appointed for the entire ONDE S.A., have the access to e-mail addresses specified above or can open letters annotated as above. When a letter is received, without its opening, the authorised person is immediately notified and the letter is delivered directly to the authorised person.

The notification should contain, in particular:

1. details of the reporting person - name, surname, position, place of work (does not apply to anonymous reports);
2. date and location of the behaviour violating this Policy;
3. details of the person(people) that violated the law (name, surname, position, place of work);
4. description of the violation, the date of its occurrence or discovery;
5. identification of people associated with the case/witnesses.

The report may also include evidence or a list of witnesses.



When it is found out that our actions, being a part of ONDE S.A. operations, led or contributed to an adverse influence on human rights, we provide for appropriate remedies as a part of legal support aiming at solving the problem. When undesirable activities result from our business relations, we undertake to support our business partners in a process of eliminating or minimising the adverse influence, while applying their own mechanisms for management of nonconformities.

This Policy is regularly reviewed for its conformance with current legislation and international rules.

