



Title

Diversity & Inclusion Policy in the KRUK Group

Applicable to

KRUK S.A., Kancelaria Prawna RAVEN P. Krupa sp.k.

Object

Diversity management at the KRUK Group, creating inclusive and accessible processes, promoting inclusivity and equal opportunities.

Repeals

Resolution No. 72/2024 of the Management Board of KRUK S.A. with its registered office in Wrocław, dated July 23, 2024.

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I. PREAMBLE

The KRUK Group's organisational culture is founded on its values, which define its direction and priorities and support the promotion of cooperation, trust and mutual respect within teams. As the KRUK Group operates in various markets and cultural environments, we are committed to continuously fostering an inclusive work environment that encourages drawing on the talents of diverse teams. This allows us to fully use our potential, as well as enhances engagement, innovation and builds a competitive advantage. It helps us better understand the needs of our diverse clients, business partners and associates.

The Diversity & Inclusion Policy provides a framework for setting and implementing goals for managing diversity, creating equal opportunities and promoting inclusive practices across the whole KRUK Group.

II. TERMINOLOGY

- DEI - respectively diversity, equity and inclusion
- Diversity - the set of characteristics of individuals in an organisation, which include, but are not limited to: gender, age, disability, mental and physical health status, race, origin, ethnicity, nationality, religion, beliefs, sexual orientation, gender identity, family status, neurodiversity, education or life experiences.
- Equity - the fair and equitable treatment of all individuals in an organisation so as to provide equal opportunities for access to resources, regardless of naturally occurring differences.
- Inclusion - deliberate actions to support collaboration so that everyone feels part of the organisation; counteracting social barriers and all forms of exclusion.
- Management Board - the Management Board of KRUK S.A.
- General Directors - the General Directors or members of the Management Boards of KRUK's subsidiaries, or in the absence of a Director General - the managers of individual KRUK Group companies.
- Group – KRUK Group, meaning KRUK S.A. and the companies dependent on KRUK S.A., governed by Polish commercial law.

III. POLICY OBJECTIVES

The Diversity & Inclusion Policy defines the following objectives:

1. To raise awareness of diversity, equity and inclusion in the workplace.
2. To shape and promote equal opportunities within the KRUK Group.
3. To effectively manage diversity and inclusion in aspects such as recruitment, hiring, remuneration, career development, promotion, employee benefits, internal and external communication (inclusive language, using preferred names and pronouns), engagement surveys, monitoring and data reporting, protection against unfair dismissals.

IV. POLICY PRINCIPLES AND IMPLEMENTATION

1. RECRUITMENT & HIRING

- i. Job advertisements, aimed to attract candidates of all genders, are written in inclusive language and the invitation to interview depends solely on the candidates' qualifications and experience.



- ii. We are committed to increase the employment of people with disabilities by reducing barriers to recruitment, reaching out to candidates and ensuring accessibility in the process.
- iii. During recruitment, we do not ask discriminatory or privacy questions, while providing opportunity to voluntarily express needs for any workplace adjustments.

2. LEARNING & DEVELOPMENT

- i. We ensure equal access to knowledge and upskilling by offering an open catalogue of trainings and participation for all people at the KRUK Group, within each position.
- ii. We promote our values at the KRUK Group through educational activities (webinars, workshops, articles in internal communications), taking into account the needs of managers. We systematically improve the level of knowledge, understanding and support of the DEI aspects in our daily cooperation.
- iii. Career development programs, as described in the Training Policy and made available to employees on the EDUKRUK platform, are conducted with gender equality in mind, ensuring equal access for women and men to career development opportunities at all levels of the organization.
- iv. Career development programs are also accessible regardless of other diversity characteristics of employees listed in this Policy. Access to development activities is provided based on identified competency needs, job responsibilities, and the execution of tasks arising from the Strategy and operations of the KRUK Group.
- v. Career development programs at the KRUK Group are conducted with consideration for:
 - a) Strengthening strategic and operational competencies within the organization
 - b) Ensuring a pool of talent ready to take on key positions in the organization, taking into account diversity of competencies and gender equality
 - c) Diverse methods of competency assessment and development path monitoring, such as annual reviews, feedback, assessment centers and development centers—especially for managerial positions—as well as diagnostic tools (e.g., Insight Discovery, CliftonStrengths) that support identifying potential and strengths and building effective teams
 - d) Collaboration between teams, departments, and companies, including internationally, in the context of the current KRUK Group Strategy
- vi. In development activities, including mentoring and coaching, we promote participant diversity to strengthen competencies and broaden perspectives on problem-solving, addressing challenges, and applying diverse working methods.
- vii. Training materials use inclusive and clear language, avoid stereotypes, and ensure tool accessibility.

3. RENUMERATION

- i. We regularly measure the pay gap, including gender pay gap and gender equal pay gap. To support this process, we conduct gender pay analyses across all business units and positions.
- ii. We analyse the reasons for the pay gap and introduce corrective measures so that the only factors influencing the pay gap are objective criteria related to the type of work performed, individual efficiency or competencies and experience.



4. MONITORING & REPORTING

- i. We monitor the following indicators: gender representation (especially in management and supervisory bodies, senior management, and managerial positions), participation of women and men in training and development programs, access to promotions, pay gap, use of parental and caregiving leave, number of employees returning after extended absences, percentage of employees with disabilities, age diversity, nationality or citizenship diversity, reported cases of discrimination, and the number of people who have completed mandatory DEI training.
- ii. We collect and analyse data to help identify gaps and strengthen practices in day-to-day collaboration.
- iii. The objectives monitored are in line with the reporting of sustainability activities, particularly in the employee aspect, taking into account the principle of double materiality.

The implementation of the Policy is further supported by KRUK Group's Business Strategy (including Mission, Vision and Values), Group HR Strategy, Code of Ethics and Human Rights Policy.

V. RESPONSIBILITY

1. The Chief Investment Officer of KRUK S.A. Management Board oversees the activities and implementation of the Diversity & Policy, and promotes, with the support of the Management Board, DEI activities and values within the whole KRUK Group;
2. The General Directors are responsible for: implementing the Diversity & Inclusion Policy in KRUK Group companies; upholding DEI values within the company, taking into account national legislation and current local needs; supporting DEI activities within the company in accordance with the adopted indicators.
3. Group Diversity, Equity & Inclusion Lead with support from Human Resources Area implements the Diversity & Inclusion Policy, advises KRUK Group companies on DEI matters, takes action to build and strengthen awareness and use of inclusive practices.
4. This Policy supports KRUK Group's efforts toward social responsibility and the implementation of the Sustainable Development Goals.

VI. FINAL PROVISIONS

1. Every employee and associate at the KRUK Group, including managers and the Management Board, are required to become familiar and to comply with the Diversity & Inclusion Policy, as well as to participate in DEI development activities, including the online training on DEI, also being a part of the adaptation path for new joiners at the KRUK Group.
2. Violations of the Diversity & Inclusion Policy may be reported via the whistleblowing channel appropriate to the concerned KRUK Group company.
3. This Policy shall be reviewed at least once a year, taking into account changes in the legal status, organisational changes and the timeliness of the process described.