

KRUK Group Human Rights Policy

Preamble

Respect for Human Rights is the observance of the set of rights and freedoms that every human being is entitled to, regardless of sex, age, disability, health condition, race, nationality, ethnic origin, religion or lack thereof, political beliefs, trade union membership, psychosexual orientation, gender identity, family status, lifestyle, or any other factors that may influence discriminatory behaviour.

The KRUK Group, aware of its obligation to respect Human Rights, decided to adopt and implement this Human Rights Policy. Preparation thereof was preceded by a due diligence of the policies and procedures in force at the KRUK Group in terms of compliance with Human Rights.

KRUK Group's Statement on Respect for Human Rights

The KRUK Group identifies itself with the international Human Rights standards set out in the documents of the United Nations (UN) and undertakes to comply therewith. These include the International Charter of Human Rights (including the Universal Declaration of Human Rights); the International Covenant on Economic, Social and Cultural Rights; the International Covenant on Civil and Political Rights; the UN Guiding Principles on Business and Human Rights, and the Ten Principles of the UN Global Compact.

The KRUK Group also supports and complies with the provisions set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises, as well as in international law and local legislation in the countries where the Group operates.

Approach to Observance of Human Rights at the KRUK Group

Commitment to the protection and respect for Human Rights in the KRUK Group is reflected in its Mission, Vision and Values, the overarching principles of business that ensure the highest ethical standards in contacts with employees, associates, business partners, suppliers, customers, shareholders, stakeholders, and the society.

As part of its processes and internal documents, the KRUK Group takes due diligence in order to prevent any direct contribution to the violation of Human Rights in the area of business operations. The Group also undertakes a number of activities to identify and mitigate the risk of Human Rights violations in its operations.

Human Rights in the Context of the Main Stakeholder Groups

Ensuring respect for Human Rights is the basis on which the KRUK Group builds its processes and conducts its operations. To this end, the KRUK Group has made a list of key stakeholder groups, both inside and outside the organisation, to which activities (incl. building information about the company's operations) are directed, according to their needs. The relevance of these groups was verified based on internal stakeholder analysis, social research, etc. Stakeholders' opinions are treated as an important and valuable voice that is taken into account in the Group's operations. The form and frequency of contacts is adjusted to specific groups of stakeholders.

Human Rights and Employees

The KRUK Group promotes the atmosphere of dignity and mutual respect in the workplace e.g. through the Diversity Policy. The right of employees to form and join trade unions and employee groups is also respected.

The KRUK Group strongly opposes violence, harassment and intimidation of employees, and does not tolerate any forms of child labour exploitation, slavery or forced labour.

Each employee receives remuneration in a manner that guarantees no discrimination with regard to sex, age, disability, race, religion, nationality, political beliefs, trade union membership, ethnic origin, religion, sexual orientation, type of contract and form of employment, in accordance with the provisions of the Remuneration Management Policy.

The safety, health and well-being of employees is a priority for the KRUK Group; therefore, the KRUK Group ensures a safe working environment in accordance with the applicable safety and health protection regulations and internal regulations, minimising the risk of accidents, injuries and health hazards. All the elements that influence the level of health and safety protection in the workplace are constantly improved.

Each employee can safely and anonymously file a complaint regarding Human Rights violations using the mechanisms provided for in the Whistleblowing Policy and the Mediation Policy. At KRUK S.A., there is also a Mediation & Consultation Team whose task is to consider complaints regarding conflict situations or unequal treatment. A complaint may be submitted by an employee who is a participant in a conflict situation or a victim of inappropriate behaviour, as well as a witness to such situations and any person who becomes aware thereof.

The communication channel that allows employees, associates, business partners, suppliers, customers and other stakeholders to provide information on violations (whistleblowing) in a confidential and anonymous manner is the Abuse Report Form: <https://pl.kruk.eu/zglos-naduzycie> available at www.kruksa.pl

Human Rights and Business Partners & Suppliers

The KRUK Group expects its business partners and suppliers to not engage in any unethical practices in the area of Human Rights. KRUK S.A.'s largest suppliers are surveyed for environmental, social and management issues, which allows us to manage the risks related to the ethicality of our business partners/suppliers. The questionnaire used contains provisions on compliance with the standards related to Human Rights.

Human Rights and Customers

Compliance with the highest ethical standards is the foundation of the KRUK Group's operations. In order to protect our customers against violations of their Human Rights, policies and procedures have been introduced to detail the ethical approach to customers, i.e. the Code of Ethics and the Principles of Good Practice in Debt Collection by the Association of Financial Companies in Poland, and to regulate the rules for the processing of personal data and its privacy, including customer data – the Personal Data Management Policy and the Information Security Policy.

Human Rights and Society

The KRUK Group is obliged to prevent financial crime, including counteracting money laundering and terrorist financing as well as other criminal activities, e.g. corruption. The occurrence of criminal activity on a financial background is a serious threat to the Human Rights of local communities and the Group's stakeholders, therefore the Anti-corruption Policy, the Gift Policy and the Procedure for Anti-Money



Laundering and Counter-terrorist Financing implemented are an essential element in creating a safe and stable financial system.

Social inequalities pose another direct threat to Human Rights. As part of its activities, acting on the basis of the Charitable Sponsorship Policy, the KRUK Group makes every effort to provide equal opportunities for excluded members of local communities, in a sustainable manner, contributing to the increase in the access to fundamental rights. Due to the profile of its operations, the KRUK Group prioritises the issue of access to reliable financial education for the public and undertakes appropriate awareness-raising activities in this respect.

In its activities for Human Rights, the KRUK Group also focuses on the environmental aspect – the right to a clean and healthy natural environment. The Environmental Policy sets the directions of action in line with the idea of sustainable development and preventing the effects of climate change.

Continuous Efforts to Improve Human Rights Procedures

In its business operations, the KRUK Group's goal is to constantly improve its procedures and policies related to respecting Human Rights, through projects such as adapting the language to the customer or implementing solutions with the use of new, more accessible technologies. Therefore, the Group makes every effort to continuously improve awareness of Human Rights and to better comply with international standards.