

HUMAN RIGHTS AND WORK CONDITIONS POLICY

OUR FOCUS IS ON SUSTAINABLE DEVELOPMENT AND CREATING A SAFE AND POSITIVE WORK ENVIRONMENT THAT ENCOURAGES CREATIVITY FOR OUR EMPLOYEES, RESULTING IN EXCELLENT SOLUTIONS FOR OUR CLIENTS.



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Our commitment to human rights extends to all aspects of our operations, including our collaborations with all entities, whether direct or indirect. This commitment is in accordance with national laws, the International Bill of Human Rights, and the UN Guidelines on Business and Human Rights.

At our company, we uphold and safeguard labor dignity principles, including fair pay, employee rest rights, and equal training opportunities. We have made sure that our work and remuneration regulation adheres to legal requirements.

We categorically refuse to tolerate any actions that contravene personal dignity, gender equality, or the principles of positive social coexistence, which includes but is not limited to discrimination, harassment, bullying, and related behaviors.

We oppose any unethical actions against our employees within our company as well as its social and business environment. We strictly comply with the prohibition of hiring minors. We make every effort not to cooperate with companies that use forced labor and child labor, as well as with companies that do not provide dignified and safe working conditions.



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CHILDREN AND MINORS

We always adhere to applicable national laws and international standards regarding the minimum age for employment. Our fundamental rule is that Ara Pneumatik will not employ children, nor will the company support child labor in any form.

Our company is committed to taking legal measures to ensure the safety of minors.



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SALARIES AND EMPLOYEE BENEFITS

The salaries of our employees meet or exceed statutory or agreed national minimum industry standards. They never fall below the wage sufficient for subsistence in our country, ensuring a decent standard of living for the employee and their family.

For overtime work, in addition to normal wages, employees are entitled to additional remuneration at the rate and on the terms set out in the labor code. Employees working at night are entitled to a supplement, as per the rate and terms outlined in the labor code. The labor code specifies that employees are entitled to an additional payment for working on Sundays or public holidays at the rate and on the terms specified.

- Timely and accurate payment of salaries is our priority.
- We provide holiday benefits to our employees.
- We support the Employee Capital Plans program in cooperation with Investment Fund Companies (TFI).
- Employees can use group insurance, implemented in cooperation with an insurance company.
- Employees can fully use their holiday leave at a convenient time for them.
- Employees are entitled to "on demand" leave.
- Employees have the option to use additional private health insurance, co-financed by the employer.



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WORK HOURS

We strictly abide by labor regulations concerning the limitation of working hours. We respect the prevailing labor law regulations and agreements concerning working hours and remuneration, as well as additional benefits defined by the company's work regulations and the terms of contracts with employees.

At ARA Pneumatik, working hours and rest periods are within the legal limits and recommendations of the International Labour Organization, according to which work cannot exceed eight hours per day and 40 hours per week. Working time is documented.

The organization has implemented the option to implement flexible working hours and hybrid work arrangements in response to employees' family circumstances and commuting limitations.

In exceptional circumstances, the company may require employees to work beyond standard working hours to meet critical business needs or to address emergency situations. Nonetheless, we strive to ensure that employees complete their work within the designated standard working hours.

Overtime work is voluntary, meaning that employees have the right to refuse overtime work. The company agrees to occasional, several-hour breaks from work, which are registered and settled with the employee in an agreed manner.



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MODERN SLAVERY

(i.e., Slavery, Servitude, and Forced or Compulsory Labor and Human Trafficking)

With full socio-economic and ethical responsibility, under the Conventions and recommendations of the International Labour Organization, applicable human rights laws, labor law regulations, and other regulations, we do not employ forced, compulsory, or slave labor practices. Adhering to ethical recruitment practices, we do not charge potential employees any fees or recruitment costs. We never require employees to post a security deposit, such as withholding identity documents or a cash deposit. Employees can always, of their own free will, resign from employment at our company, provided that they submit a notice of resignation, observing the terms and conditions specified by labor law regulations and the provisions of the contract. As a tool for identifying forced labor, we follow the indicators developed by the International Labour Organization in cooperation with the European Union.



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ETHICAL RECRUITMENT

ARA Pneumatik actively strives to provide equal employment and advancement opportunities for qualified individuals. Our organization is dedicated to carrying out all personnelrelated activities and company-sponsored programs in an ethical manner, without any form of discrimination. We treat job applicants with due respect, providing them with necessary information at each recruitment stage to ensure full communication, the personal comfort of the candidate, and the ability to make an informed and voluntary decision. During interviews, we do not ask discriminatory or embarrassing questions, nor do we discuss ideological issues. We care about proper behavior towards employed individuals, raising awareness among both the recruitment staff and managers. We always comply with national laws and international norms regarding the minimum age for starting work. Ara Pneumatik takes steps to ensure proper protection for minors and adopts the principle that children will not be employed at Ara Pneumatik, and the company will not support child labor in any way. A written employment contract is given to candidates, ensuring clarity and transparency. The contract is presented in a language that candidates can understand, and it clearly states their rights and obligations as employees. In accordance with the employment agreement, applicable laws, and provisions of the relevant contract, an employee possesses the inherent right to terminate their employment.



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FREEDOM OF ASSOCIATION AND COLLECTIVE NEGOTIATIONS

Our company recognizes and endorses employees' right to participate in unions, engage in organizing activities, and engage in negotiations. We uphold the right of every employee to decide whether to join associations and trade unions. We acknowledge and are receptive to engaging in discussions and negotiations on behalf of a broader collective of employees.

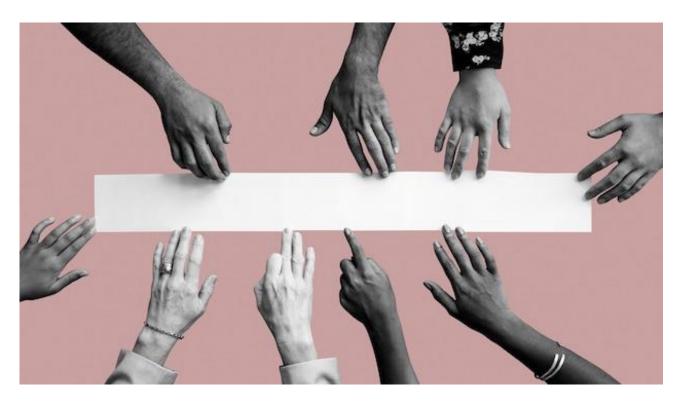


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PROHIBITION OF DISCRIMINATION AND PREVENTION OF HARASSMENT

ARA Pneumatik ensures equal treatment for all employees and job applicants regardless of race, skin color, religion, ethnic or national origin, gender, sexual preferences, age, disability, political beliefs, or union membership. This principle is relevant to recruitment, employment, training, promotion, and other employment conditions. Discriminating against an employee or job applicant constitutes a serious violation of labor law, equal employment opportunities, and the company's policy. Every supervisor must ensure that acts of discrimination do not occur.

Our company is committed to guaranteeing equal employment and promotion opportunities for qualified candidates. The company must ensure that it conducts all personnel actions and programs with no acts of discrimination. An employee always has the right to resign in accordance with the employment contract, applicable laws, or provisions of the relevant contract.

In the "Work Regulations" adopted and in force in our company, the employer is obliged, among other things, to "counteract discrimination in employment, in particular based on gender, age, disability, race, religion, nationality, political beliefs, union membership, ethnic origin, religion, sexual orientation, as well type of employment (employment for a definite or indefinite period, full-time or part-time)". The company is also obliged to take all the measures necessary to prevent workplace mobbing.



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WOMEN'S RIGHTS

We believe in upholding women's rights to equal treatment in all professional and social domains. Our company does not tolerate discrimination against women based on gender or parenthood. Our goal is to promote equality through measures that include equal pay, equal opportunities for women to advance and receive benefits, and nomination for training that enhances their qualifications. We strive to create a friendly space for employees' parenthood and family responsibilities, regardless of gender.



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DIVERSITY, EQUALITY, AND INCLUSIVITY

Our company supports an inclusive approach, accepting diversity, and our talented employees can remain true to themselves on their path to success. We accept and respect differences because we believe they are beneficial to the organization and its employees. Our goal is to create an inclusive environment where we show respect, value, and encourage everyone to participate. By doing this, we not only fulfill our duty but also enhance customer value, brand quality, and customer loyalty.



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MINORITY AND INDIGENOUS PEOPLE'S RIGHTS

In accordance with international standards, ARA Pneumatik protects the rights of minorities and indigenous groups in line with the Declaration on the Rights of Persons Belonging to National or Ethnic, Religious, and Linguistic Minorities and the United Nations Declaration on the Rights of Indigenous Peoples. The protection also includes cultural, historical, and religious sites, ensuring their preservation and unrestricted access for local or indigenous communities.



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LAND, FOREST, AND WATER RIGHTS AND FORCED EVICTIONS

ARA Pneumatik recognizes and upholds the rights to land, forest, and water, while actively opposing forced evictions in accordance with national and international standards. Our actions align with environmental laws and prioritize the dignity of residents. In accordance with our policy, we strive to prevent forced evictions and the depletion of land, forests, and waters when acquiring and developing land.



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THE USE OF PRIVATE OR PUBLIC SECURITY MEASURES

At ARA Pneumatik, we prioritize the issue of security, ensuring the safety of our employees at their workplaces, job candidates throughout the recruitment process, and clients during registration, purchasing, and data storage.

Our employees receive periodic occupational health and safety (OHS) training from an external company to keep their knowledge up to date.

We have a well-maintained security system in place to protect both company and personal property.

Our fleet of vehicles is regularly serviced and insured to meet legal requirements.

The user data registered in our system is securely stored by an external company, with protocols in place to safeguard all actions after logging in.

Our building's strategic location on a major city road allows for effective access to public services such as ambulances and fire brigades in case of emergencies.



OCCUPATIONAL HEALTH AND SAFETY TRAINING

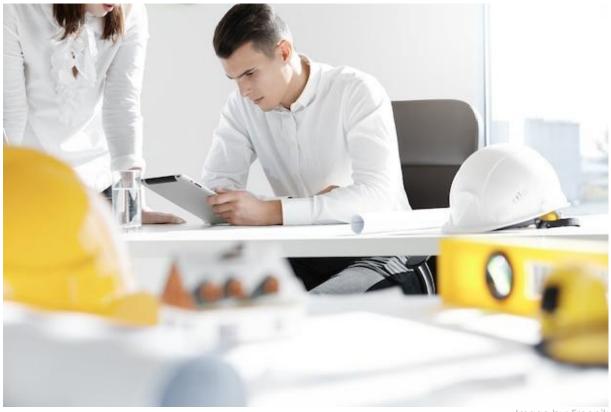


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GENERAL REGULATIONS

An individual lacking the necessary qualifications, skills, and knowledge of safety regulations and occupational principles must not be permitted to undertake this particular job. The necessity of employee training is exempted if they move from one employment contract to another with the same employer, maintaining the same job position. It is the employer's responsibility to furnish occupational health and safety training prior to granting the employee permission to work, and to regularly administer training in this field.

The employer is obliged to:

- Familiarize employees with the occupational safety and health regulations and rules concerning their work,
- Issue detailed instructions and guidelines regarding occupational safety and health at the workplace.

Note! The training sessions referred to in this chapter occur during regular working hours and are covered by the employer.

Detailed information about occupational safety and health training is contained in the regulation of the Ministry of Economy, Labour and Social Policy of July 27, 2004, on the detailed rules of training in the field of occupational safety and health (Journal of Laws No. 180, item 1860). Employers and authorized organizational units are responsible for conducting training activities in the field of occupational safety and health, as stated in this regulation.

However, training for individuals who are employers, occupational health and safety service employees, instructors, and lecturers on occupational safety and health topics can only be conducted by organizationally authorized units. Training organizers (employer or authorized organizational unit) ensure:

- Training programs for specific groups of positions.
- Lecturers and instructors with high qualifications, appropriate to the implemented training programs.
- Suitable training facilities.
- Teaching equipment necessary for the proper implementation of training programs.
- Proper conduct of training and improvement in occupational safety and health, and maintaining documentation in the form of training programs, class journals, protocols from the course of exams, and registers of issued certificates.

The training for occupational safety and health is conducted in the following ways:

- Initial training,
- Periodic training and development

Training sessions can be delivered through various formats, including instructional sessions, seminars, courses, and self-directed study. An exam should be administered at the end to assess the participants' understanding of the training program.

INITIAL TRAINING

Initial training includes:

- General initial training (general instruction).
- Initial training at the workstation (on-the-job instruction).

The general instruction is being undertaken by:

- Newly hired employees.
- Students participating in student internships.
- Vocational school students participating in hands-on vocational training at various workplace environments before being allowed to perform work independently.

General instruction is conducted by occupational health and safety service employees, or by employers or employees designated by the employer, who have completed current occupational health and safety training.

On-the-job instruction is conducted before allowing to perform work at a specific workstation, in relation to:

- Employees hired for manual labor and other positions directly related to production and its control or exposure to occupational hazards,
- Employees moved to positions mentioned earlier, or following technological or equipment changes.
- Vocational students undergoing practical vocational training and students undergoing student internships.

The employer designates an individual who possesses the necessary qualifications and professional experience to carry out on-the-job instruction.

PERIODIC TRAINING

The initial periodic training must be completed by individuals within a maximum of six months from commencing work in a specific role.

- Individuals who are employers,
- Individuals directing workers (managers, foremen).

The first periodic training for employees in the positions listed below is conducted within a period of up to 12 months:

- Employees in manual labor positions.
- Designers and constructors of machines and other technical devices.
- Technologists, production organizers, and other engineering and technical staff.
- Occupational health and safety service employees.
- Additional staff members with job responsibilities involving exposure to health hazards, nuisances, or occupational health and safety duties.

For manual labor positions where there are particularly significant health risks and accident hazards, basic training should be conducted before commencing work on these positions. The employer specifies the list of such positions.

Periodic training is conducted for groups of individuals who were identified during introductory training. The employer, in consultation with the plant trade union organization or a representative of the workforce (in the absence of unions), determines the frequency and duration of periodic training, subject to the following conditions:

- Training for employees in manual labor positions should be conducted in the form of instruction at least once every 3 years, and for positions with particularly significant health risks, at least once a year.
- Training for the remaining groups should be conducted at least once every 5 years.



INFORMATION ABOUT HEALTH AND SAFETY TRAINING.

Based on the contract concluded with Ara Pneumatik, ul. Wyścigowa 38, 53-012 Wrocław, occupational health and safety services are provided by Ekookno, Pracownia BHP and environmental protection Słoneczna 48, 52-326 Wrocław. The services include, among others: health and safety training based on the Regulation of the Minister of Economy and Labor of July 27, 2004 on training in the field of occupational health and safety, Journal of Laws 2004 No. 180 item 1860 with later changes. On the day of starting employment, each employee undergoes initial training (general instruction provided by the occupational health and safety service and on-the-job instruction provided by a person from the workplace with appropriate qualifications. The first periodic training of people employed in the positions listed in § 14 section 2 point 1 above. regulation (persons who are employers and other persons managing employees, in particular managers, foremen and foremen are carried out within a period of up to 6 months from the start of work in these positions, and employed persons in the positions listed in § 14 section 2 points 2-5 (employees employed in blue-collar, administrative-office, engineering-technical positions) within a period of up to 12 months from the start of work in these positions.

The training is repeated in the cycles specified in the above. regulation:

- In workers' positions, it is repeated in the form of instruction for a period not exceeding 3 years (currently, there are no particularly dangerous jobs that shorten the cycle to one year)
- · In administrative and office positions every 6 years,
- In other positions every 5 years.

P.W. "EKO-OKNO" Marek Dębicki (2) ul. Słoneczna 48, 52-334 Wrocław www.ekobhp.pi - tel. 504 19 18 99 NIP 894-256-58-06 R.932910551

SPECJALISTA ds. 5 (1) mgr inż. Mirosław Pierzgalski 19,03 2024