

HR AND SOCIAL POLICY

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I MANGATA HOLDING GROUP OF COMPANIES' VALUES IN THE SOCIAL PILLAR

Mangata Holding S.A. (hereinafter also referred to as „Mangata Holding” or „Company”) is one of the largest and best developing holding companies in the industrial sector in Poland. It has know-how, a team of experts and broad management competence in the metal industry. Mangata Holding focuses on generating profits for its shareholders and on the continuous growth of the Holding Company's value, while taking care to preserve its unique organisational culture and to achieve its sustainable development goals. The overriding value of Mangata Holding's operations is the principle of **BEYOND THE PROFIT**, so initiatives are actively implemented that benefit employees, society and customers, and build the value of Mangata Holding as a responsible and friendly organisation.



Mangata Holding's HR policy is an integral part of the Company's policy and development strategy. The aim of the HR policy is to attract competent and committed employees who contribute to the growth of the Holding Company's value and to develop their skills. This approach fosters a working environment based on cooperation, innovation and high efficiency.



Mangata Holding attaches great importance to providing employees with optimal and safe working conditions, equal opportunities, clear assessment criteria and opportunities for professional development. Mangata Holding promotes a culture of cooperation in which it strives to make all employees feel respected and able to pursue both their professional goals and their passions in life. Mangata Holding creates a friendly and safe working environment, offering its employees healthcare and supporting their sports activities. In exceptional circumstances, including those related to the effects of climate change, Mangata Holding provides help and support, valuing the diversity of the team, drawing on a diversity of employees of different genders, ages and cultures.



Mangata Holding seeks to deepen dialogue with its key stakeholders – customers and local communities – to better respond to their needs, mutually support each other's sustainability efforts and proactively communicate the impact of our organisations on the local ecosystem and community.

II SCOPE OF THE POLICY

This HR and Social Policy is a set of general principles and reflects good practices, and is a reference document that serves as a benchmark for other Mangata Holding Group entities to implement their own actions in the field in question. The Mangata Holding Group of Companies comprises the following entities:

1

Mangata Holding S.A.



2

Kuźnia Polska S.A.



3

Śrubena Unia Sp. z o.o.



4

Masterform Sp. z o.o.



5

Zetkama Sp. z o.o.

7

**Zetkama Real Estate
Sp. z o.o.**

6

Zetkama R&D Sp. z o.o.



The above entities use this policy as the basis for developing their own regulations, taking into account the modifications necessary to ensure, among other things, that the documents comply with the requirements of the law and the recommendations and requirements of the supervisory authorities. The regulations affected by this policy in force on the date on which it comes into force should be adapted accordingly.

III BACKGROUND AND OBJECTIVES OF THE POLICY

1. The objectives of the HR and social policy are realised based on:



National and international legislation, including the UN Sustainable Development Goals (SDGs) aspects related to the social dimension of sustainable development, in the context of the requirements of the CSRD (Corporate Sustainability Reporting Directive) and ESRS S1 and ESRS S3 (European Sustainability Reporting Standards).



Internal normative acts.



Internal policies, including organisational and governance policies.



Adopted ethical standards (Code of Ethics).

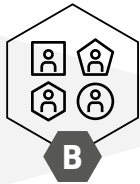
2. The objectives of the HR policy are part of the organisation's development strategy defining the principles and standards concerning the relationship between the employer and employees. This policy takes into account the following objectives:

- A. Employment and work security and health protection.
- B. Social dialogue and collective bargaining.
- C. Appropriate pay and working time.
- D. Gender equality and equal pay.
- E. Diversity.
- F. Training, skills development and appropriate recruitment.
- G. Work environment and workplace culture.

In pursuing its HR policy objectives, which also take into account the principles of sustainable development, Mangata Holding supports employees in the following key areas:



Health provisions and quality of life:
improving health conditions and raising employees' living standards.



Supporting diversity, gender equality and redressing inequalities:
promoting diversity in the workplace, gender equality and eliminating all forms of inequality.



Innovation:
stimulating creativity and innovative solutions in processes and products.



Local ecosystem development:
supporting initiatives aimed at the development and sustainability of local communities and ecosystems.



Economic growth:
dążenie do osiągania długoterminowego wzrostu ekonomicznego poprzez trwałe praktyki biznesowe.

3. An overarching objective of the social policy that is also part of the organisation's development strategy is to systematise the approach to dialogue with local communities. In pursuing this objective, Mangata Holding is guided by the following principles:

- A. Social dialogue.
- B. Monitoring the impact on communities and the environment in which they live.
- C. Education to build public awareness and its own positive impact.
- D. Support of local communities.
- E. Financial transparency.

IV EMPLOYMENT SECURITY, WORK SAFETY AND HEALTH PROTECTION

Employment security, work safety is one of Mangata's core values. The safety culture is based on building awareness of risks and preventive measures, the development of a safe and ergonomic working environment and compliance with procedures. Work is organised to ensure safe and hygienic working conditions, complying with regulations and promptly rectifying any irregularities.

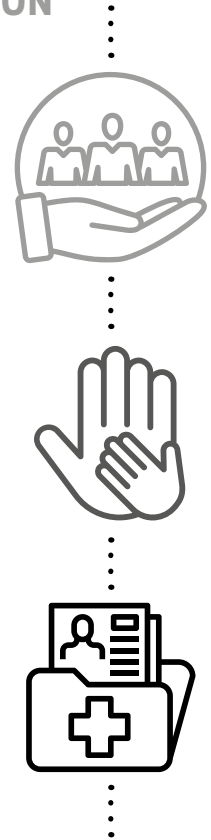
In terms of employment security, which is understood as countering modern slavery and forced child labour, the highest importance is given to ethical labour standards and human rights. This policy sets out a commitment to countering all forms of modern slavery and child labour in our own operations and throughout the supply chain. The policy is implemented through adherence to high ethical standards, supplier audits and partnerships with local communities, and thereby eliminating forms of exploitation. Emphasis is placed on employee education, transparency and compliance with international regulations to protect human rights and promote sustainability.

Protecting the health and lives of employees and their families is a priority. Supporting these areas, Mangata Holding provides employees with private healthcare and group life insurance, fostering improved efficiency and employee health, and provides appropriate support to employees in crisis.

Caring not only for employees but also for their family members, a wide range of insurance is financed: group life insurance, business travel insurance, D&O insurance – liability insurance not only for the Company's authorities but also for employees performing supervisory or management functions.

What's more, employees are provided with free private health care and the means necessary to ensure safe and hygienic working conditions. We also take care of ergonomics at work - aiming to optimise and adapt workplaces to the mental and physical capabilities of employees.

In the area of production, robotisation and work automation programmes are being developed at the level of the Subsidiaries to introduce improvements to production lines to reduce overloading and protect the health of employees.



V SOCIAL DIALOGUE AND COLLECTIVE BARGAINING

Mangata Holding S.A. conducts an open and constructive dialogue with employees and their representatives and enables employees to join trade union structures. As an Employer, it engages responsibly in transparent collective bargaining, striving to achieve mutually beneficial solutions. The Company promotes cooperation based on mutual respect, making social dialogue a reality as an important element of the organisational culture. The aim of these activities is to create harmonious relations and build a lasting consensus for the development of the Company and employee satisfaction.

The stated objective of cooperation with employee representatives and social dialogue is implemented through:



A

Regular meetings with employee representatives, aiming to reach an agreement that takes into account both the needs of employees and the interests of Mangata Holding, ensuring the sustainable development of the organisation.



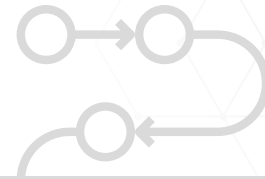
B

Organising surveys and consultations to find out employees' opinions on the functioning of the organisation.



C

Jointly developing initiatives to improve working conditions and increase employee satisfaction.



In order to detect irregularities in the organisation, and to provide protection to whistleblowers, including employees, Mangata Holding has implemented an internal procedure for reporting and following up on legal violations. Training for employees in this area has also been provided.



VI ADEQUATE PAY AND WORKING HOURS, GENDER EQUALITY AND EQUAL PAY

Adequate remuneration according to one's competences and skills is a key element in sustainable development and improving the quality of life of employees, helping to reduce social inequalities. Mangata Holding therefore strives to create a remuneration structure that provides equal pay for equal work or work of equal value, promoting the principles of fairness and equality. Employees are remunerated on the basis of their competence, experience and performance, regardless of gender. Moreover, equal access to jobs, promotions and training is ensured. Gender Gap (wage gap) analysis is also conducted at the Mangata Holding Group level to identify and, if it occurs, gradually eliminate the wage gap. Through participation in a market-based salary analysis and grading, the gender pay gap is monitored and analysed, and if a pay gap is identified, action is taken to make adjustments to ensure a fair and balanced approach to remuneration. Not only employees but also those on civil law contracts, replacement contracts, employed by temporary employment agencies or on an employee leasing basis, are entitled to decent working conditions and respect. Mangata Holding complies with regulations on employees' working hours, with full respect for the right to rest and family life. The company ensures that employees are provided with adequate time for recuperation and to fulfil family obligations, which is in line with current legal regulations on working time.



VII DIVERSITY

Mangata Holding S.A. takes measures to promote and support diversity in the workplace as a key element of the organisational culture. Gender, ethnic, age and cultural diversity, union membership, but also respect for disabilities, contribute to mutual tolerance within the team, which is fundamental to business success.

Equality is promoted, acceptance of legitimate differences, openness and the use of employees' potential regardless of their individual traits, making it a reality to create a working environment in which all employees have equal opportunities in terms of access to training, promotions and the elimination of any discrimination. Remuneration is set based on competence, experience and performance rather than other criteria such as gender.



VIII TRAINING, SKILL DEVELOPMENT AND RECRUITMENT

Mangata Holding makes an effort to integrate the training and skills development policy for employees with the organisation's sustainable development strategy. The onboarding programmes incorporate aspects of sustainable development, i.e. environmental education, work ethics or management of sustainable practices. Emphasis is placed on the development of employees' competencies and preparing them adequately to meet the organisation's strategic challenges by creating opportunities to improve specialised qualifications, language competencies and the possibility to take advantage of subsidised higher education and postgraduate studies, including an MBA. Employees can benefit from classroom training, courses and e-learning platforms, as well as book publications. The synergy achieved at the Mangata Holding Group level allows experiences, solutions and ideas to be shared and promoted rapidly, sometimes requiring an instant response, through communication channels also available to the Subsidiaries.

An employee's creativity and willingness to develop are important values that are appreciated and rewarded. Investing in employee training and mentoring, allows employees to acquire new skills and develop their talents. Employees also expand their awareness, through the implementation of training and activities, in the areas described below:



Environment (E):

Training includes topics related to the environment, energy efficiency, recycling, etc. On this basis, employees should be aware of the environmental impact of their actions as well.



Society (S):

Training addresses work ethics, diversity, safety and health in the workplace. Corporate social responsibility and employee involvement in social initiatives are promoted.



Governance (G):

Training takes into account the principles of good corporate governance. Efforts are made to ensure that employees understand the importance of transparency, integrity and accountability in the organisation's operations.

In caring for the development of staff, an ongoing dialogue with employees is conducted and regular employee satisfaction surveys are carried out. It is a good practice in Mangata Holding Group Companies to create project teams in order to conduct in-depth discussions with employees with regard to selected issues. On this basis, the possibility of implementing selected improvements in the organisation responding to the needs raised by employees is assessed.

Through the recruitment process, Mangata Holding aims to create a team that reflects social and cultural diversity, which is key to innovation and the achievement of sustainability goals. All hiring decisions are made solely on the basis of objective criteria such as candidates' qualifications, experience and skills. The underlying idea is that the recruitment process should be transparent and accessible to all potential employees. Cooperation with recruitment intermediaries only takes place if the intermediaries declare that they do not charge candidates. In the recruitment process, emphasis is placed on direct communication, which allows us to build a more authentic relationship from the outset and to understand each other's expectations of acting for Mangata Holding.

Mangata Holding attaches great importance to the induction of a newly recruited employee into the workplace. Each newly hired employee is supported by another employee of the Company, who is responsible for the practical introduction of the new person to the team. The adaptation process includes:

A. Familiarisation of the newly hired person with the company, its organisational culture and applicable rules, the people working in it, and introduction to the implementation of specific tasks..

B. Evaluation of the employee before the end of the working period agreed in the employment contract, together with the development of competence development plans.

IX WORKING ENVIRONMENT AND WORKPLACE CULTURE

To emphasise work-life balance, flexible working hours and the possibility to work remotely are offered. There is a focus on health and physical activity, financial stability, raising living standards and development of employees on many levels. An extensive benefits package for employees is also provided.

As a friendly organisation, Mangata Holding also takes measures to provide employees with:



A



A programme to promote physical activity.

B



Private medical care.

A very important principle in the organisation is mutual respect and appreciation of the individuality and competence of each employee. Particular care is taken to create a friendly workplace, provide conditions for development and freedom of contact. At the same time, it is important to have a culture of behaviour that serves to build a positive image of employees and the company as a whole.

Employees are the company's showcase and, through their behaviour and adherence to the rules, they create a consistent and trust-inspiring image of the company and the Mangata Holding Group. A team of employees that are kind to each other works more effectively and is able to achieve better results in every area.

X SOCIAL OBJECTIVES

Mangata Holding sees great value in cooperation with its neighbours – the local communities. This is based on the belief that systematising the communication process and developing support for local initiatives in the ESG area will make it possible to build long-term relationships with the community. Continuing to cooperate with local institutions and building a positive image as an employer contributes to increasing the economic attractiveness of the region.

One of the foundations of sustainable development is responsible communication with local communities. Within the Mangata Holding Group, efforts are taken to develop a social communication framework to systematise the entire process. Local communities have the possibility to report to the Companies' Management Boards on violations, the need to counteract negative impacts, and the development of a course of action for a particular sector.



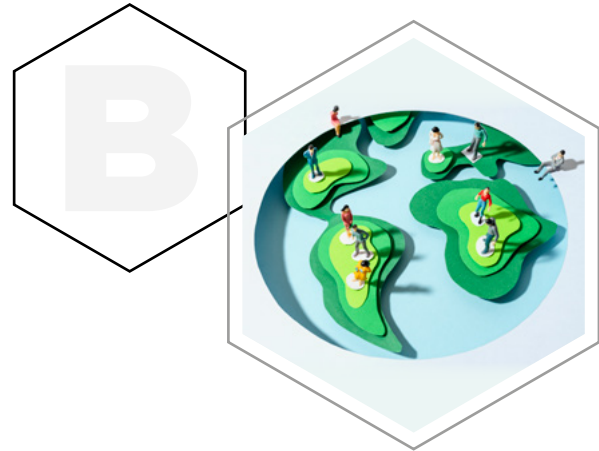
Strengthening the relationship with the local community based on mutual respect and understanding makes it possible to achieve social objectives, through:

A. **Social dialogue.**

Mangata Holding's priority is development based on the principles of sustainable development, safety and mutual trust with local communities, which at the same time contributes to strengthening the image of the Mangata Holding Group as socially responsible. Cooperation with municipalities and non-governmental organisations is undertaken, and through this social dialogue, the Mangata Holding Group employs local residents and implements various initiatives through sponsorship and donations.

B. Monitoring the impact on local communities and the environment in which these communities live.

Monitoring the impact on communities and the environment is part of Mangata Holding's sustainability strategy. Regular analyses of data on emissions, resource consumption and other indicators allow us to assess and minimise the negative effects of our activities on the environment. Cooperation with local communities and public institutions is aimed at jointly implementing projects that benefit both the environment and local residents.



C. Education to build public awareness and own positive impact.

Supporting education is a tool for equal opportunities and social inclusion. Great importance is placed on supporting entrepreneurship and creating new jobs or apprenticeships for students from local schools with which cooperation has been established. When establishing cooperation with local communities and promoting education, preference is given to employing local people so that they contribute to the local economy, of which they are a part by virtue of their residence. Efforts are made to make the Mangata Holding Group companies attractive and reliable employers for local communities.

D. **Support for local communities.**

Support for local communities encompasses a wide range of activities, not only in relation to social groups that can coexist to build the value of Mangata Holding but also in relation to people whose social value is marginalised due to their disability. An example is the involvement in the expansion of a centre for the disabled or a project to provide comprehensive support for children and young people growing up outside their biological families and for people with disabilities. Mangata Holding's sponsorship and charity policy also includes financial support for local initiatives in the fields of culture, art, sport, education and environmental and health protection. Particular attention is paid to the needs of the youngest and those most in need, and support is also offered for the activities of local authorities, public benefit institutions and private initiatives.



E. **Financial transparency.**

This aspect plays a key role in achieving sustainable development goals. Regular reporting and disclosure of financial and non-financial information is fundamental to Mangata Holding's operations. The implementation of this principle consists of publishing detailed reports that provide information on significant activities, expenditures, investments and impacts on the environment and local communities. In order to ensure an independent assessment of the activities undertaken, Mangata Holding uses verification by external auditors. Through financial transparency, trust and credibility are built among stakeholders, which is crucial for long-term success and the achievement of sustainability goals.

XI OVERSIGHT STRUCTURE, INTERPRETATION, ACCESSIBILITY

1. The Management Board of Mangata Holding S.A. is the owner of the Company's HR and Social Policy.
2. Mangata Holding Group HR is responsible for oversight, including updating and implementation of its policy, with the cooperation of the HR officers of the individual companies within the Group.
3. The HR and social policy is available to all employees on the Group's website: **www.mangata.com.pl**
4. The objectives of the HR and social policy are implemented in accordance with accepted ethical standards, the principles of „good practice” and respect for diversity, based on formally defined working conditions to which internal regulations refer.
5. This policy serves as the basis for own regulations of subsidiary companies. The HR and social policy of Mangata Holding is adopted in its entirety by the companies that make up the Mangata Group.

