

HUMAN RIGHTS AND DUE DILLIGENCE POLICY

("POLICY")

In all areas of activity, the HORSE capital group and each of the companies belonging to the group (the **"HORSE Group"**, the company belonging to the Group is defined for the purposes of the policy as the **"HORSE"**) are committed to:

- respect and observe human rights,
- avoid significant negative impacts on human rights,
- conduct appropriate human rights due diligence processes (also in relation to the entities with which it interacts).

The Group undertakes to respect the rights and provisions defined in the following internationally recognised documents:

- Universal Declaration of Human Rights,
- International Bill of Human Rights,
- UN Guiding Principles on Business and Human Rights,
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct,
- Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work.

This Policy has been developed to strive to ensure that human rights are respected at HORSE Group. The **"Code of conduct"** and the **"Whistleblower Rules"** constitute documents that set forth the expectations we have of our culture, our employees and associates, and the ways in which we conduct business, with the goal of promoting and respecting human rights as well as ensure the protection of human rights at the operational level in everyday work.

HORSE is committed to promote principles for the protection of human rights, to raise the awareness of human rights in the company and to increase its possibilities in the scope of resolving problems related to this issue. In terms of protecting human rights, our priorities include respecting labour rights, gender equality, countering corruption, and addressing human rights violations in our supplier network.

HUMAN RIGHTS FOR EMPLOYEES

HORSE creates a working environment where ethical conduct is respected and promoted and where employee diversity is an asset.

Any discriminatory behavior or in any other way violating established ethical principles is not accepted at HORSE. HORSE supports diversity among the employees and associates by providing equal opportunities.

HORSE commits to promote equal opportunities and to recognise the value of diversity by providing a work environment accessible for people with disabilities and a welcoming culture for people with varying characteristics. We strive to provide a safe, friendly and healthy work environment to maintain the well-being of employees and associates, in accordance with applicable laws and internal HORSE regulations.

HORSE responds appropriately to changes on the labour market, taking them into account as factors in the risk research and adjusting its system regulating the framework of ethical conduct.

We strongly oppose to underage child labour as well as any form of forced service or labour. HORSE does not condone any form of human trafficking.

The right of freedom of association and the right to collective bargaining are observed in HORSE Group, including the right to form trade unions and other labor organizations in accordance with the respective provisions of law.

HUMAN RIGHTS IN BUSINESS

We do not accept any form of bribery or corruption through financial facilitation or gifts or other benefits as a means of influencing actions or opinions. We also do not tolerate any other unethical or illegal practices, in accordance with the “**Anti-Corruption Policy**”.

We process personal data in accordance with applicable regulations and in a manner that ensures adequate security. We protect data from unauthorized or unlawful processing and from accidental loss, destruction or damage by using appropriate technical or organizational measures.

The HORSE Group takes care of due diligence in its supply chain, establishing cooperation only with entities that act ethically. In the process of selecting suppliers of materials and services, one of the qualification criteria is the observance of human rights by the company with which HORSE intends to sign an agreement. The process consists of mandatory ESG questionnaire filled in by the suppliers and acceptance of “**Code of Conduct**”.

With regard to contractors and local communities, the HORSE Group does not allow any form of discrimination and undertakes to provide information about its activities in a fast and transparent manner.

HUMAN RIGHTS DUE DILLIGENCE

The HORSE Group entrust its asset manager, EPP, with the procedures to:

- clearly define the responsibility of the company bodies for human rights within the company, and organises the day-to-day responsibility in this regard in the relevant internal functions,
- use resources and expertise to manage human rights on an ongoing basis in its operations and business relationships,
- identify human rights risks and impacts on an ongoing basis according to the “**Reputational Risk Management Procedure**”, including when triggered by key events in the company’s operations (e.g. policy change, market entry, new projects and/or services). This includes stakeholder engagement, including in particular groups exposed to negative impacts as part of the process of identifying risks and impacts,
- seeks ways to prevent or mitigate adverse human rights impacts that are directly linked to HORSE business operations.

EPP undertakes to act on its own or to cooperate on corrective actions for the benefit of entities, e.g. employees and associates, as well as communities, in situations when it identifies or is notified about any negative impact in the area of human rights.

The EPP Group monitors and evaluates the effectiveness of the above process and its response to human rights threats and impacts and uses this information to continuously improve its processes and systems. This includes involving stakeholders and vulnerable groups in assessing the effectiveness of any actions taken.

An internal quarterly report on notifications is produced based on data from the whistleblowing system. Risk reviews, including risks and impacts on human rights, are also reported as part of annual non-financial reporting.

FINAL PROVISIONS

The obligations of this Policy apply to all employees, customers, suppliers and contractors who are in relationships with HORSE Group.

HORSE Group allows confidential whistleblowing to prevent violations, including reporting human rights violations. If anyone believes that there has been a violation of this Policy in our organization, he or she is requested to report it immediately in accordance with the “**Whistleblower Rules**”. This Policy may be amended or repealed by an appropriate resolution.

Throughout its term, this Policy is available at the headquarters of HORSE companies in written form and in digital form in the Group's internal electronic resources.