

A man with brown hair and glasses, wearing a grey and red striped blazer over a beige turtleneck, is holding a tablet. A woman with long brown hair, wearing a beige blazer over a light blue top, is pointing at the tablet. They are both smiling and looking at the screen. The background is a blurred outdoor setting with a car.

HUMAN RIGHTS POLICY PCC EXOL S.A.

May 2026



PCC EXOL S.A. is committed to conducting its business in accordance with the highest ethical, legal, and social standards. Respect for human dignity, equality, and social justice constitutes the foundation of our operational practices.

We recognize our responsibility to respect human rights across all areas of our business activities and throughout our value chain. We declare our commitment to acting with due diligence in respecting human rights by identifying, preventing, mitigating, and remedying adverse human rights impacts. Where immediate elimination of such impacts is not feasible, we implement measures aimed at reducing their severity and establishing corrective actions.

As an employer, we reinforce our commitment to human rights by ensuring a safe workplace that embraces diversity and promotes equality and non-discrimination. We do not tolerate any form of forced labour, illegal child labour, or human trafficking. We respect the right of employees to freely form and join organizations of their choice. We communicate this Human Rights Policy across the organization and support employees in understanding our processes and expectations, enabling them to identify and address issues that may negatively impact human rights and to support efforts to improve working and living conditions.

We expect all business partners, including affiliated entities, suppliers, customers, and contractors, to uphold human rights within their operations and to identify adverse human rights impacts within their value chains. We expect to be promptly notified if they determine that they may cause, contribute to, or be directly linked to adverse human rights impacts. If any adverse human rights impacts are identified in connection with our operations or value chain, we will seek to collaborate with relevant parties to implement preventive or corrective measures.

To effectively fulfill our responsibility to respect human rights, we expect all employees and business partners to avoid actions that may cause or contribute to adverse human rights impacts.

PCC EXOL S.A. provides employees and stakeholders, including suppliers, customers, partners, contractors, and local communities, with access to a grievance mechanism for reporting human rights concerns related to our operations or value chain.

Reports may be submitted to: etyka@pcc.eu.

All reports are registered, assessed, and addressed confidentially, ensuring anonymity of reporting individuals. PCC EXOL S.A. strictly prohibits retaliation against anyone who reports human rights concerns in good faith. Any form of reprisal - including threats, intimidation, deterioration of working conditions, denial of promotion, or termination - is forbidden.

WITHIN OUR OPERATIONS AND THROUGHOUT THE VALUE CHAIN:

1.We declare compliance with international human rights standards:

- The International Bill of Human Rights
- UN Guiding Principles for Business and Human Rights
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
- ILO Declaration on Fundamental Principles and Rights at Work and core ILO conventions
- UN 2030 Agenda for Sustainable Development
- Responsible Care Program
- Diversity Charter

2.We declare respect for human rights in the workplace:

- Ensuring compliance with applicable workplace regulations
- Adhering to fair remuneration and equal pay for work of equal value
- Preventing discrimination, bullying, and harassment
- Supporting diversity and inclusion and counteracting all forms of discrimination
- Respecting employee privacy
- Respecting freedom of association and the right to information, consultation, and participation
- Ensuring freedom to choose employment
- Prohibiting forced labour, including human trafficking
- Prohibiting unlawful child labour; only legal vocational training and apprenticeships in accordance with labour law are permitted

3.We declare respect for human rights in the value chain:

- Requiring suppliers, partners, subcontractors, customers, and all other entities in the value chain, to uphold the same standards we apply internally
- Engaging in active cooperation with stakeholders, supporting dialogue and actions promoting human rights throughout the value chain

4.We declare respect for the rights of local communities:

- Respecting the rights of local communities in areas where we operate, in line with internationally recognised human rights standards
- Complying with environmental and public health regulations
- Minimizing negative impacts of our operations on local communities

This Human Rights Policy has been developed in alignment with international human rights standards and is consistent with Code of Conduct at PCC EXOL and other sustainability-related policies.

The Policy has been approved by the Management Board of PCC EXOL S.A. and is publicly available.

The Management Board is responsible for its implementation. All employees, regardless of position, share responsibility for its execution, supported by the Human Resources Department and compliance oversight functions.

Dariusz Ciesielski
President of the Management Board
PCC Exol S.A.

Adam Jarosz
Vice-President of the Management Board
PCC Exol S.A.

