



**ADOPTED BY THE
BOARD OF DIRECTORS**
June 2025

ANTI-DISCRIMINATION POLICY of HERTI JSC

I. INTRODUCTION

Discrimination is any unfavourable or unequal treatment of an individual or group based on personal characteristics that are not related to professional qualities and abilities. This includes, but is not limited to: gender, race, ethnicity, human genome, nationality, origin, religion or belief, education, beliefs, political affiliation, social or community status, disability, age, sexual orientation, marital status, economic status, trade union membership, as well as any other factors protected by national and international legislation.

II. GOALS

The policy describes the methods and actions the Company takes to protect its employees, partners, and customers from discrimination. This policy applies to all Company employees, customers, partners, contractors, subcontractors and visitors.

The Company does not discriminate directly or indirectly in hiring, determining compensation, access to training, promotions, termination of contract, or retirement.

III. SCOPE AND IMPLEMENTATION

This policy is valid for all employees, managers, partners, clients, contractors, subcontractors and visitors of HERTI JSC and aims to provide an environment in which all persons are treated with respect, equality and dignity.

IV. PRINCIPLES AND COMMITMENTS

- HERTI JSC guarantees equal development and professional growth opportunities, without discrimination or bias.
- Employee evaluation is based solely on professional skills, performance, contribution and behavior.

- The company provides conditions that support diversity and inclusion, creating a work environment free from discrimination, harassment and all forms of intolerance.
- We implement and comply with international standards and good practices in the ESG field (Environmental, Social, Governance), especially related to social responsibility and equality.

V. UNACCEPTABLE PRACTICES

As discrimination are considered, but not limited to:

- Hiring, promotion, appointment, determination of remuneration or termination of employment relationships based on discriminatory factors.
- Deliberately hindering career development or access to training.
- Sexual harassment, sexist, racist or other offensive language, including written or verbal correspondence.
- Exclusion from professional events or social activities for discriminatory reasons.
- Creating a hostile or abusive work environment for individual employees or groups.

VI. REPORTING AND PROTECTION PROCEDURES

- Any employee or partner who feels the victim of discrimination can file a complaint anonymously or in person, without fear of reprisal.
- HERTI JSC ensures that all complaints are dealt with promptly, confidentially and with due seriousness.
- When violations are identified, adequate disciplinary measures are taken, including training, corrective actions or sanctions.

VII. TRAINING AND RAISING AWARENESS

The anti-discrimination policy in the workplace must be communicated **through training or instruction** to all personnel involved in the performance of services and processes. Training is conducted:

- Initially – upon joining the job.
- Periodically – once every three years;
- Extraordinary – in case of:
 - Change in the policy content;
 - Occurrence of a specific event or incident.

VIII. RESPONSIBILITIES

- Every employee of HERTI JSC bears personal responsibility for the implementation of this policy and the creation of an environment free from discrimination..
- Managers have an obligation to be an example to the others and to provide support for the implementation of the principles of equality and justice.

The company does not accept or tolerate any type of hostile actions that create an uncomfortable working environment.!

Management is fully aware that discrimination can also be unintentional, based on subconscious prejudices or personal beliefs. In the event that Management determines that discrimination by an employee is unintentional, we undertake to support and help our employee, through training and organizational actions, to overcome their prejudices.

To make sure our actions are fair to everyone, as well as legal, we:

- We strive to be as objective as possible in the job advertisements we publish, not specifying the gender, age or ethnicity of the candidates sought;
- We compile and implement structured and regulated criteria for hiring new employees, promoting existing staff, rewarding an employee and/or team of employees, etc.;
- We offer adequate wages and insurance benefits based on the position, length of service, qualifications and performance of our employees;
- We provide work for disabled people;
- We require the HR Department to maintain adequate and up-to-date information regarding decisions made to hiring new staff, disciplinary actions, terminations, etc.;

This policy is subject to periodic review at least once every 3 years or upon significant changes in legislation or the strategic direction of the company.

This Policy was adopted by the Board of Directors at its meeting on 24.06.2025