



GROUP DIVERSITY POLICY



Revisions

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Policy properties

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1. Policy provisions

1.1 Objective

Diversity, equity, and inclusion are at the core of our business operations at the SOLEK Group, as we understand and value our multinational employee base.

For us, diversity, equity, and inclusion mean maintaining a respectful environment for all identities, creating opportunities and support for everyone to succeed in their jobs. We understand that for our international business operations to thrive, we must do our best to ensure that everyone feels safe, included and welcomed as an employee in our SOLEK Group, regardless of their gender, ethnicity, sexual orientation, religion or other belief, belonging to an indigenous ethnic group, or age. Our goal is to ensure that no matter one's identity, all employees feel comfortable bringing their authentic selves to work every day and they know that SOLEK Group will always strive to make our working environment a safe place for them. Discrimination of any kind is not tolerated, nor are xenophobia, homophobia, racism, or sexism. Because we have diverse personnel, it is in line with our sustainability strategy to ensure that this policy is implemented to the best of our abilities. Hence, in this policy statement, we offer an overview of what we do, and what we aim to achieve with our DEI strategy. This policy is in line with the SOLEK Sustainability Strategy and focuses on the material topic of Employees:

The material topic of employees means ensuring a good working environment, equal pay for work of equal value as well as diversity and gender equality. Providing good quality benefits and trainings to retain talent is also covered.

This policy is closely connected to our Code of Business Conduct and Ethics, chapter 4.1 Equality and Diversity:

The Group is proud of its international team, consisting of 15 nationalities in several locations around the world. The Group values and encourages the broad range of perspectives and capabilities this diversity brings. The Group defines diversity as differences of race, ethnicity, national origin, religion, cultural background, gender, age, disability, caste, marital status, union membership, political affiliation, pregnancy, health, sexual orientation, and gender identity. The Group expects and promotes mutual respect and understanding between people with different personal situations or backgrounds. Discrimination of any kind would not be tolerated. Any suspected breach of these rules should be immediately reported to a supervisor or the Legal and Compliance Department for investigation or reported in accordance with the Code of Business Conduct and Ethics, chapter 7: Reporting of Concerns.

1.2 Regulatory framework

The main regulatory framework for this policy is described in **the Group Human Rights and Local Communities Policy**, chapter 1.2 Legislative framework:

International treaties and human rights instruments that SOLEK Group respects and which we pledge to promote and contribute to fulfilling through our economic activities:

- The OECD Guidelines for Multinational Enterprises reflect governments' expectations of businesses on how to act responsibly. They set up Guidelines approved by OECD Member States, including the Czech Republic, on how the SOLEK Group should act responsibly on sustainability risks. Through our Group's Human Rights Policy, we especially focus on gender equality and the need for heightened sensitivity to gender issues in countries where women might be disproportionately affected, including aiming to develop a gendered approach to due diligence. Furthermore, we aim to implement the OECD "Practical actions for companies to identify and address the worst forms of child labor in mineral supply chains" in which SOLEK Group participates;
- The American Convention on Human Rights;
- The International Bill of Human Rights (the Universal Declaration of Human Rights and the UN Covenants on Civil and Political Rights and on Economic, Social and Cultural Rights);
- The EU Charter of Fundamental Rights;
 - EU Non-Discrimination Legislation, namely the following directives: Directive 2000/43/EC against discrimination on grounds of race and ethnic origin; Directive 2000/78/EC against discrimination at work on grounds of religion or belief, disability, age or sexual orientation; Directive 2006/54/EC equal treatment for men and women in matters of employment and occupation; Directive 2004/113/EC equal treatment for men and women in the access to and supply of goods and services; Directive Proposal (COM(2008)462) against discrimination based on age, disability, sexual orientation and religion or belief beyond the workplace.
 - Including creating strategies and plans to implement the following directives which are not yet binding, namely the Women on Boards Directive, Pay Transparency Directive, CSRD, and CSDDD;

- The International Labour Organization Declaration on Fundamental Rights and Principles at Work;
- The UN Declaration on the Rights of Indigenous Peoples;
- The UN Standards of Conduct for Business Tackling Discrimination against Lesbian, Gay, Bi, Trans, and Intersex People;
- The Istanbul Convention (Council of Europe Convention on Preventing and Combating Violence Against Women and Domestic Violence);
- The Convention on the Rights of Persons with Disabilities (UNCRPD).

ESG

Diversity is a part of non-financial reporting. Thanks to ESG reporting, DEI and its support and development through CSR have become a significant identifier in many ESG ratings.

ESRS

According to the European Sustainability Reporting Standards, companies should explain how they identify and manage their impact on the workforce in various areas including diversity. Companies should disclose that they have policies aimed at the elimination of discrimination, policy commitments related to inclusion, and whether and how these policies are implemented through specific procedures.

Diversity indicators such as gender distribution in top management and age distribution among employees should be disclosed.

Women on Boards Directive

From 2026, large companies operating in the EU will have to ensure a share of 40% of the “underrepresented sex” – usually women – among non-executive directors. The EU has also set a 33% target for women in all senior roles, including non-executive directors and directors such as chief executive and chief operating officer.

UN Sustainable Development Goals

In the framework of the [Sustainable Development Goals](#), we identified one target which we pursue within the Sustainability Strategy: [Gender Equality](#)

UN Guiding Principles on Business and Human Rights

Business enterprises should respect human rights. This means that they should avoid infringing on the human rights of others and should address adverse human rights impacts with which they are involved.

1.3 Scope

This Group Diversity Policy connects with the SOLEK Group Sustainability Strategy. The Policy applies to all Employees and serves them as ethical guidance. This Policy should also be communicated to all business partners and stakeholders.

1.4 Definitions and Abbreviations

Policy	The Group Diversity Policy
Company	SOLEK HOLDING SE, ID No.: 29202701, with registered seat at Voctářova 2497/18, Libeň, 180 00 Prague 8, registered Commercial Register kept by Municipal Court in Prague, file No. H218
SOLEK Group	The Company and its subsidiaries
Group Company	All companies that are part of the SOLEK Group
Employee	All employees, officers, contractors, directors or members of statutory bodies of all Group Companies
Sustainability strategy	SOLEK Sustainability strategy issued in 2022.
CSR	Corporate Social Responsibility
ESG	Environmental, Social, Governance
ESRS	European Sustainability Reporting Standards
DEI	Diversity, Equity, Inclusion
Diversity	Having a heterogeneous mix of characteristics and/or identities (race, ethnicity, nationality, sex, gender identity, veteran status, physical and cognitive ability, age, sexual orientation, socioeconomic class, experience, etc.)
Equity	Regardless of their identity, all employees are compensated fairly and have the opportunity and support to succeed and grow in their jobs
Inclusion	The identities of all employees are respected and valued. Employees have the opportunity to participate and contribute regardless of their identity
Discrimination ¹	Unequal treatment which occurs directly or indirectly - direct discrimination will have occurred when an individual is treated less favorably by comparison to how others, who are in a similar situation, have been or would be treated, and the reason for this is a particular characteristic they hold, which falls under a "protected class". Indirect discrimination occurs when an apparently neutral rule disadvantages a person or a group sharing the same characteristics. It must be shown that a group is disadvantaged by a decision when compared to a comparator group.
Harassment ¹	A course of comments or actions that are unwelcome or should reasonably be known to be unwelcome, to the person towards whom they are addressed. Harassment occurs when one or more employees are deliberately abused, threatened and/or humiliated in circumstances relating to work. Harassment may be carried out by one or more employees, with the purpose or effect of violating the target's dignity, affecting their health, and/or creating a hostile work environment
Pinkwashing ²	The practice of a state or company presenting itself as gay-friendly and progressive to downplay its negative behavior
Persons with disabilities ¹	Individuals including those who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others. Disability is the umbrella term for impairments, activity limitations, and participation restrictions, referring to the negative aspects of the interaction between an individual (with a health condition) and that individual's contextual factors (environmental and personal factors)

¹ EFRAG, ESRS S1 Own Workforce, 2022, p. 26/28/29, accessed on: https://www.efrag.org/Assets/Download?assetUrl=%2Fsites%2Fwebpublishing%2FSiteAssets%2FED_ESRS_S1.pdf

² Pinkwashing, Wikimedia Foundation, last update: 9 June 2022, accessed on: <https://en.wiktionary.org/wiki/pinkwashing>

2. Key Principles

The SOLEK Group understands our responsibilities vis-a-vis our employees and the societies we conduct our business in to go well beyond the regulatory framework in which we operate, especially regarding discrimination and harassment.

2.1 Rights of employees

SOLEK's efforts to ensure the rights of employees applicable for this policy are described in the Human Rights Policy chapter 2.2: Ensuring the rights of employees:

- We commit to ensuring the full enjoyment of all individual rights of our employees per the EU CFR and International Bill of Human Rights.
- We promote Diversity, Equity, and Inclusion as defined in our Diversity Policy.
- We are against all discrimination in the workplace, and we will ensure that all our employees and HR are trained to act in line with EU anti-discrimination laws and our Diversity Policy across of all our business activities.
- We maintain strict Health and Safety provisions, as defined in our Integrated Policy on Health, Safety, Environment, Quality and Social Responsibility and are improving our conditions to be aligned with ISO 45001 in accordance with the SOLEK Sustainability Strategy.
- We protect employees who raise concerns ("whistleblowing") as defined by the Code of Business Conduct and Ethics and the Group Whistleblowing and Investigation Policy.

Anti-Bullying and Anti-Harassment *As a SOLEK Group, we demand all of our employees and any subcontractors working with our employees to not to engage in harassment, bullying, or workplace violence; not to aid, abet, or encourage others to engage in harassment, bullying, or workplace violence; to behave in a responsible and professional manner; to treat others in the workplace with courtesy and respect; to listen and respond appropriately to the views and concerns of others; and to be fair and kind in their dealings with others. We will train all our employees to ensure this, and we have a safety system and an anonymous reporting system in place.*

Equal Pay and Remuneration

- By 2025, we will ensure that all our employees and subcontractors are receiving above the minimum wage and living wage, in line with the Global Living Wage Coalition's research.
- Through our Group Diversity Policy, we pledge to respect gender equality and narrow the gender pay gap, not only to ensure pay equity but also pay equality by supporting women in management.

2.2 Reporting of concerns

We encourage all employees who have experienced or witnessed discrimination or harassment to report it via the whistleblowing channel, notify a supervisor, or report it to the Legal and Compliance Department for investigation. The SOLEK Group does not tolerate retaliation, and those who report any incidents are protected.

The reporting process is described in detail in Code of Business Conduct and Ethics, chapter 7: Reporting of Concerns:

Acting in accordance with applicable legal (EU Directive 2019/1937 on the Protection of Persons who report violations of EU law) and internal regulations is one of the Group's highest priorities.

All Employees, Business partners, or third parties can raise concerns or report any situation they witness that is in conflict with the Code or damages the good name of the Group, or if they have a reasonable suspicion in the work context about a breach of applicable laws or internal regulations within the Group. Violations include both illegal acts and omissions and abusive practices.

To obtain guidance about a business ethics or compliance concern or to report a suspected, planned, or actual violation of applicable laws or internal regulations within the Group, one or more of the following methods can be used at any time in any language:

- by personally contacting the Group Compliance Officer;

- by mail to the address:

SOLEK HOLDING SE,
The Group Compliance Officer,
Vocťářova 2497/18,
180 00 Praha 8 - Libeň,
The Czech Republic;

- by e-mail: compliance@solek.com;
- by leaving a phone message: +420 737 182 977
- by contacting the local ombudsperson established in the particular Group Company for these purposes.

In any case, the notifier is guaranteed protection, complete confidentiality, and if required, anonymity.

All reports are objectively and independently investigated by the Group Legal and Compliance department. Corrective action is taken based on the findings. The notifier will be informed about the result of the investigation if he/she provides contact information.

The SOLEK Group is committed to protecting whistleblowers. Whistleblowers will not be disadvantaged in any way for reporting in good faith and will be protected from retaliation including the threat of retaliatory measures or attempts at them.

The Model of Notification for reporting concerns is found in Annex No. 1 to the Code of Business Conduct and Ethics.

3. Implementation

3.1 Responsibilities

HR

The Human Resources Department is responsible for diversity, inclusion, and equity throughout the hiring process. It is necessary to provide inclusivity training for all interviewers, including management, to prevent unconscious bias and ensure a welcoming environment for diverse applicants. It is recommended to cooperate with programs that enhance representation and implement enhanced employee referral programs for candidates who identify as belonging to underrepresented communities. The HR Department is also responsible for tracking SOLEK Group's DEI metrics.

DEI team

The Diversity, Equity, and Inclusion team will conduct Diversity training for all employees upon the start of their employment and repeat the training annually for everyone. The D&I team will also promote diversity activities, such as further education of employees in areas such as unconscious bias, microaggressions based on one's belonging to an underrepresented group, and allyship training that is done by both allies and members of underrepresented groups. Employee Resource Groups should also be encouraged and supported by the D&I team.

Legal and Compliance Department

The Legal and Compliance Department is responsible for the investigation of any reported incidents. All reports should be investigated objectively and independently. Retaliation in any form is not tolerated.

Management

Management has a legal responsibility to prevent discrimination and harassment. In order to do that, SOLEK Group management is clearly communicating about Diversity to all employees including sharing the Group Diversity Policy. The SOLEK Group management also demonstrates how it promotes diversity and equity in the workplace to set an example of respectful and inclusive culture for employees.

Whole organization

Employees in the whole organization should create a welcoming and safe workplace for everyone. All employees are obliged to take the Diversity training, get familiar with the Group Diversity Policy, and in case they see any violations, follow the reporting process described in the Key Principles.

3.2 Indication of further tasks and activities

On top of our Sustainability Strategy, we identified several diversity goals and KPIs to focus on in the upcoming years.

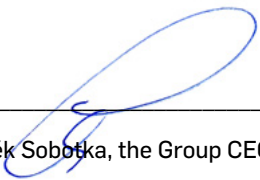
Our short-term goal is to perform a DEI Audit at SOLEK Group to set our baseline of where we are now and identify how we can progress further with Diversity, Equity and Inclusion topics. We also plan to issue our DEI Strategy in 2023.

The main KPIs that we want to focus on are:

- Proportion of less represented gender in Management (%/yr)
- Proportion of less represented gender among all Employees (%/yr)
- Proportion of employees with disabilities in the Group (%/yr)

Approval Authority Signature and Date

In Prague on 11. 01. 2023



Zdeněk Sobotka, the Group CEO

