

# HUMAN RIGHTS POLICY

## Our commitment

At Device Europe sp. z o. o., we recognize the respect for human rights as one of our core objectives and commitments - an integral part of our responsible approach to conducting business.

We are committed to complying with Polish and international law and standards, including:

- the United Nations Universal Declaration of Human Rights (UDHR);
- the 10 Principles of the UN Global Compact, covering human rights, labour, environment, and anti-corruption;
- the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and the ILO Core Conventions, covering: freedom of association and the right to collective bargaining; the elimination of all forms of forced or compulsory labour; the effective abolition of child labour; the elimination of discrimination in respect of employment and occupation; and a safe and healthy working environment;
- the United Nations Guiding Principles on Business and Human Rights (UNGPs).

In addition, we apply internal practices and procedures that strengthen the protection of human rights across our operations and value chain.

## Our principles

### Prohibition of forced labor, child labor, and human trafficking

We reject all forms of forced labor, child labor, human trafficking, and modern slavery. We comply with all applicable national and international laws in this area, in line with the ILO Core Conventions on the elimination of forced and compulsory labour and the abolition of child labour.

### Prohibition of discrimination and violation of labor rights

We promote a culture of equality, tolerance, and respect. We do not accept any form of discrimination based on:

- origin, gender, race, skin color, age;
- sexual orientation, family status;
- nationality or ethnic background, immigration status;
- religion, political beliefs;
- disability or health condition, including HIV/AIDS;
- union membership or trade union activity;
- caste or socio-economic status.





We ensure a workplace free from bullying, harassment, discrimination, and any form of violence. We take care of the health and safety of our employees, in alignment with the ILO Declaration on Fundamental Principles and Rights at Work.

### **Gender equality and women's rights**

We take into account the interests, needs, and priorities of both women and men. We monitor the representation of women in decision-making roles and ensure that everyone has equal opportunities for growth and career development.

### **Fair compensation**

We promote fair remuneration, adequate to qualifications, experience, and responsibilities. We comply with labor law, international acts, and internal regulations.

### **Work environment**

We create a work environment that is fair, diverse, and inclusive. We support employee well-being and promote work-life balance.

### **Freedom of association**

We respect the freedom of association and create conditions for the free operation of trade unions and other employee organizations - in accordance with applicable law and the ILO Core Conventions on freedom of association and the right to organise.

### **Right to privacy**

We protect the privacy of our employees, clients, and business partners. We manage personal data responsibly and in compliance with the GDPR and other applicable regulations.

## **Implementation and accountability**

This Policy is approved by the highest governing body of Device Europe sp. z o. o. and applies to all employees, contractors, and business partners of the Company. The Sustainability Officer is responsible for monitoring compliance with this Policy and reporting to the Management Board.

Any concerns regarding human rights violations may be reported via the Company's grievance mechanism (Procedure for Reporting Irregularities), accessible on the Company's website. Reports may be made anonymously and are protected from retaliation, in line with applicable Polish whistleblower protection law.

## **Supporting documents**

Our principles are reflected in the following Company documents:

- the Device Europe Code of Ethics and Business Conduct;
- the Device Europe Supplier Code of Ethics and Conduct;

- the Device Europe Procedure for Reporting Irregularities (whistleblowing procedure);
- the Device Europe Sustainability Report (annual).

## Version control

Version	Date	Description of changes	Approved by
1.0	November 2025	Initial public version	Maciej Jakimiec, Member of the Management Board (Członek Zarządu)
2.0	9 May 2026	Added explicit references to: ILO Declaration on Fundamental Principles and Rights at Work and ILO Core Conventions; UN Guiding Principles on Business and Human Rights (UNGPs). Restructured Commitment section into a list of international standards. Added Implementation and Accountability section with grievance mechanism reference. Reorganized supporting documents. Aligned with B Lab Standards V2.2, sub-requirement HR 1.1.1.	Maciej Jakimiec, Member of the Management Board (Członek Zarządu)

## Approval



**Maciej Jakimiec**

Managing Director / Członek Zarządu *Device Europe sp. z o. o.*

*Place: Bydgoszcz, Poland*

*Date: 9 May 2026*