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## ***"Code of Ethics and Gender Equality Policy"***

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## Introduction

APOPSI ROMANIA S.A. is committed to creating a work environment based on ethical values, integrity and respect for all employees. Shaping an ethical and fair workplace is a cornerstone of our corporate culture, and embracing these principles expresses management's commitment to upholding equality and fair treatment.

The company favors a system of behavior based on ethical values, focusing not only on compliance rules but also on preventing and combating any form of discrimination or violent behavior in the workplace. Particular attention is paid to new challenges, such as the use of digital media and remote work, with the aim of maintaining a coherent, modern and safe working environment.

The company's value framework includes respect for laws and institutions, integrity, respect for people and the environment, and professionalism.

Based on these principles, APOPSI ROMANIA S.A. promotes gender equality and the avoidance of any form of discrimination. Employees recognize and respect the value of every human being, regardless of race, color, origin, gender, religious or other beliefs, disability, age, social or marital status, sexual orientation or gender identity.

The company fosters collaboration and teamwork, promoting the free exchange of knowledge and opinions among employees. Employees are required to treat their colleagues and supervisors with courtesy, respect, responsibility, fairness, and empathy, fostering a culture of inclusivity and mutual appreciation.

APOPSI ROMANIA S.A., with a dynamic total of 15 employees, of which 8 are women and 7 men (2026), is committed to ensuring equal opportunities for professional development, remuneration and participation for all, without discrimination based on gender, and to actively promote equality and empowerment of all its employees. Gender equality requires all genders to enjoy socially valuable goods, opportunities, resources and rewards equally, while embodying a culture of diversity and mutual respect.

This Gender Equality Policy is part of the broader framework of the Environmental, Social and Corporate Governance (ESG) principles of APOPSI ROMANIA S.A. and contributes to the sustainable development of the organization, enhancing transparency, inclusion and long-term corporate value.

## Scope of the GEP (Gender Equality Policy)

APOPSI ROMANIA S.A. is committed to creating and maintaining a work environment that promotes dignity, respect and cooperation. All employees and interns of the company must



treat their colleagues, customers and every partner in a fair, equal and dignified manner, respecting human rights and the principles of equal treatment.

The company strictly enforces the prohibition of any discrimination or inappropriate behavior related to race, age, role, gender, gender identity, color, religion, country of origin, sexual orientation, marital status, dependents, disability, social class, or political opinions. The company recognizes that discrimination may not occur in isolation, but may result from the coexistence of more than one characteristic, such as gender in combination with age, disability, national or social origin, marital status or other factors. In this context, this Gender Equality Policy takes into account the intersectional dimension of discrimination, seeking to prevent and address complex forms of inequality in the workplace. Compliance with these principles applies to all stages of the employment relationship, such as recruitment, performance evaluation, promotion, remuneration and benefits, as well as training and skill development, based solely on the merit and competence of each individual.

It is important to emphasize that the company does not tolerate direct offensive or intimidating behaviors, including sexual or other forms of harassment or bullying, based on any of the above characteristics. Also, indirect insults or actions that create an unpleasant or hostile environment, such as the use of offensive or sexually explicit jokes, the distribution of offensive or disturbing material, the misuse of personal information or the sending of unsolicited messages via email or other means of communication, will not be tolerated.

Any conduct that violates this policy is considered a serious misconduct and may lead to the imposition of disciplinary measures (oral or written notice, negative performance evaluation, downgrading, suspension, dismissal), in accordance with the company's internal procedures, **subject to the specific provisions of the corporate policy pursuant to Part II of Law 4808/2021.**

### Objectives & Measures:

Our company is committed to promoting gender equality and creating a work environment based on fairness, transparency, and diversity. In this context, it implements the following gender policy, with clear objectives and corresponding measures:

- Ensuring equal opportunities: all recruitment, evaluation and promotion processes are based on objective criteria, with standardized assessment tools and anonymization of CVs where necessary to eliminate gender bias.
- Promoting leadership capabilities for all genders: setting quantitative targets for equal representation in management positions, support with mentoring, coaching and leadership skills seminars for traditionally underrepresented teams.
- Creating a safe and supportive environment: strengthening a culture of respect and zero tolerance for any form of discrimination or harassment, by establishing safe and confidential reporting channels and transparent complaint resolution processes.



- Supporting work-life balance: providing flexible working hours, teleworking and parental leave support, with the aim of maintaining equal opportunities for development regardless of personal obligations.

Through these measures, the company ensures that all employees are fairly evaluated and supported, fosters their trust and participation, and fosters an environment where each individual's value is fully realized, fostering sustainable growth and innovation. Gender equality is seen as a strategic asset that strengthens cohesion, improves productivity, and increases the organization's resilience to social and economic challenges.

Partnership policy is based on the principles of the Treaty on European Union (Article 2), which recognizes equality between women and men as a fundamental value, and on the EU Charter of Fundamental Rights, which explicitly states that all forms of discrimination are prohibited. At the same time, it is in line with Directive 2006/54/EC on the implementation of the principle of equal treatment of men and women in employment and occupation, as well as with Directive (EU) 2019/1158 on work-life balance for parents and carers.

Gender policy also incorporates the priorities of the European Commission's 2020-2025 Gender Equality Strategy, which focuses on creating a Europe of equality, where men and women have equal opportunities to participate and lead. Additionally, it aligns with the European Pillar of Social Rights, which explicitly recognizes gender equality and equal pay as fundamental principles of a fair and inclusive labor market.

## Incident prevention and management

The company implements proactive measures regardless of the level of risk assessment, recognizing that prevention is a key element in ensuring a safe and inclusive work environment. All incidents are investigated with seriousness and impartiality, while ensuring that confidentiality is respected and victims are protected from any vindictive behaviors. Clear complaint mechanisms (both internal and external) have been put in place to which employees, collaborators or volunteers can turn. These procedures include recording the incident, being investigated by a competent body and taking measures that can range from a warning to dismissal, depending on the severity of the violation. In addition, there is provision for referral to specialized support services and cooperation with the relevant public authorities.

APOPSI ROMANIA S.A. expressly and categorically prohibits any form of retaliation against a person who:

- lodge a complaint in good faith,
- testifies as a witness,
- cooperates or participates in any way in the investigation process of an incident of discrimination, harassment or gender-based violence.



Any act of retaliation, such as disadvantage, change of duties, downgrading, threat, intimidation or negative evaluation, constitutes a serious disciplinary violation and is dealt with the same sanctions as for incidents of harassment.

## Putting it into practice

The implementation of the policy covers a wide range of organizational functions. It starts with the selection and recruitment process, which is designed in such a way as to ensure the objectivity and equal treatment of all candidates. Job advertisements are drafted in neutral language and wording that may exclude or discourage specific groups is avoided. In addition, at all stages of the professional career, from assessment to promotion, procedures based on transparent and measurable criteria are adopted.

Education and awareness are critical axes of policy. All employees participate in training programs aimed at recognizing and addressing unconscious biases, as well as cultivating collaboration skills in diverse environments. Special care is given to human resources managers and management executives, who are called upon to ensure the faithful application of the principles of equality in the daily management of their teams.

In terms of working conditions, the policy provides for the full implementation of the principle of "equal pay for equal work", with payrolls reflecting the value of the position rather than characteristics such as gender. At the same time, the importance of work-life balance is recognized, through measures such as the possibility of flexible hours, teleworking where possible and the facilitation of parental care for all genders. Protecting pregnant women, new mothers, and fathers is a key part of this commitment, ensuring that family obligations do not become a barrier to career advancement.

## Procedure for Receiving and Managing Complaints of Sexual Harassment

APOPSI ROMANIA S.A. recognizes that sexual harassment is a serious form of violation of rights and that it can occur in conditions of inequality of power. For this reason, a clear and well-defined procedure has been established for receiving and handling relevant complaints.

The receipt, investigation and examination of complaints is implemented in full compliance with the company's Policy for the prevention and treatment of violence and harassment at work, in accordance with Part II of Law 4808/2021. This policy specifies in detail the competent persons, the communication channels, the timetables, the stages of investigation, as well as the protection measures provided and the penalties in the event of infringements.



In the context of the implementation of the above policy, a Complaint Receipt Officer has been appointed, who ensures the recording, investigation and management of complaints with impartiality, confidentiality and respect for the rights of all parties involved. The submission of complaints is carried out by name and with the observance of confidentiality, in accordance with the provisions of the company policy.

The corporate policy for the prevention and treatment of violence and harassment has been communicated to all staff and is supported by employee information and awareness actions. At the same time, it is ensured that the victim always retains the right to turn to the competent public authorities or to the courts, regardless of his choice to use the company's internal mechanism or not.

### Public Authorities for the Submission of Complaints

In addition to the internal complaint mechanism of APOPSI ROMANIA S.A., as provided for in the company's Policy for the implementation of the measures and obligations of Part II of Law 4808/2021, those directly affected by incidents of violence and harassment at work retain the following options regarding the methods of complaint:

- *to the employer or to the Complaint Management Officer, as defined in the above policy;*
- *Labor Inspection / Territorial Labor Inspectorates (ITM) at +40 21 302 70 70*
- *to the "Avocatul Poporului" (www.avp.ro),*
- *to the National Agency for Equal Opportunities for Women and Men (ANES) at +40 800 500 333*
- *to a Lawyer or to the competent Judicial and Police Authorities*

*(The possibility of recourse to these bodies is independent of the victim's choice to make use of the internal mechanism of the Organization)*

### Monitoring and evaluation

The effectiveness of the Gender Equality Policy cannot be taken for granted without continuous monitoring and evaluation. The company intends to develop and implement a framework for monitoring and periodic evaluation of the relevant measures, with the aim of ensuring their effective implementation. In this context, indicators and reporting procedures will be defined, while the periodic briefing of the Management and staff will be provided, where appropriate.



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In particular, the monitoring of the implementation of the Policy will be based on indicative quantitative and qualitative indicators, such as:

- gender representation in positions of responsibility and decision-making;
- any gender pay gaps;
- the participation of employees in training and awareness-raising actions on equality and inclusion issues,
- the number of complaints submitted, as well as the time taken to manage and complete their investigation.

The findings of the monitoring are used to improve the measures implemented and, where necessary, to take corrective actions. The Gender Equality Policy is reviewed periodically, at least every two years, to take into account organizational changes, developments in legislation and best practices in the field of equality.

The Gender Equality Policy is an integral part of an organization's development strategy. It is not limited to a set of rules but represents an active commitment to creating an environment based on fairness, diversity, and inclusion. Its successful implementation requires the participation of everyone - from management to each employee - and proves that gender equality is not only a right, but also a lever for progress, innovation and sustainable development.

***This Gender Equality Policy has been approved by the Management and comes into force on 02/02/2026.***

For the company "APOPSI ROMANIA S.A."

DANIEL JIANU