

REGULATION NO. 3/2026  
OF THE GENERAL MANAGER OF GÓRKA CEMENT SP. Z O.O.  
WITH REGISTERED OFFICE IN TRZEBINIA

of May 14<sup>th</sup> 2026

**ON COUNTERACTING FORCED LABOUR, SLAVE LABOUR AND THE EMPLOYMENT OF MINORS**

Acting on the basis of Article 94 point 4 and Article 207 § 2 point 1 of the Act of 26 June 1974 the Labour Code (consolidated text. Journal of Laws of 2025, item 277), as well as taking into account the obligations adopted by Górka Cement Sp. z o.o. with its registered office in Trzebinia in the area of corporate social responsibility (CSR), I hereby order the following:

**§ 1. General Rules**

1. In the workplace Górka Cement Sp. z o.o. with its registered office in Trzebinia (hereinafter referred to as the "**Company**") any form of forced labour, slavery labour, servitude, or human trafficking is prohibited. Work performed for the Company may only be voluntary.
2. The Company does not employ minors, i.e. persons who have not reached the age of 18 on the date of establishing cooperation, subject to paragraph 4 below.
3. The above rules shall apply to all forms of cooperation entered into by the Company, regardless of the legal basis, including employment contracts, civil law contracts, and agreements concluded with suppliers/subcontractors. The prohibitions referred to above shall also cover traineeships, internships, and summer programmes if they would result in the establishment of an employment relationship or the actual performance of work/services for the Company.
4. The rules described above do not apply to educational visits, open days, school internships organized only in the form of observation, without performing work and without providing services, as well as competitions and social initiatives that do not include a work element.

**§ 2. Control procedures**

1. **The Human Resources and Administration Department** (for employees and persons engaged under civil law contracts) verifies age on the basis of submitted documents needed to conclude contracts.
2. In the case of contracts other than those indicated in paragraph 1, **the Director/Manager of**

**the Department or the specialist responsible for a given project** ensures that before a specific person (supplier/subcontractor) commences to perform work, a statement is made by that person or by his/her employer/principal that the work will not be performed by a minor and that the employer/principal does not allow the use of any forms of forced labour, slavery, servitude, or human trafficking. The statement may be submitted as a separate point in the contract. The template is attached as Appendix No. 1 to this Regulation.

3. In the process of recruitment and admission to work, only the necessary data (in particular the date of birth) are processed – in accordance with Article 22<sup>1</sup> § 1 of the Labour Code and Article 6 (1) (c) of the GDPR (necessity to comply with a legal obligation).
4. Before the Company's suppliers/subcontractors start working on the premises owned by the Company, the verification of the age of persons entering the premises of the plant is carried out by the Company's security officer on the basis of an identity document at the time of registration of entry to the plant.

### **§ 3. Reporting of violations and sanctions**

1. Employees and stakeholders can report suspected violations of the rules described above:
  - via the online Whistleblowing Portal available at: <https://whistleblowing.mapei.com>,
  - by e-mail address: [signalista@gorka.com.pl](mailto:signalista@gorka.com.pl),
  - directly to the Human Resources and Administration Department.
2. If a violation of the prohibition of employment is found, the minor is immediately removed from performing any tasks.
3. Violation of the principles described in this Regulation constitutes a serious breach of employee obligations and may result in termination of the employment contract without notice.

### **§. 4 Final provisions**

1. I hereby oblige the Directors and Managers to immediately familiarize all employees with the content of this Regulation.
2. This Regulation enters into force on the day of its publication.

Appendix No. 1  
to the Regulation No. 3/2026  
of the General Manager of Górka Cement Sp. z o.o.  
with its registered office in Trzebinia

Statement template

"The Supplier/Contractor\* declares that no activities required in connection with the performance of the concluded contract will be performed by minors. The Supplier/Contractor\* does not allow the use of any form of forced labour, slavery, servitude or human trafficking"

*\* delete unnecessary*

*Date: .....*

*Name: .....*

*Name of the supplier/contractor: .....*