MediCertLab Pleasure of cooperation	Document Code:	MCL_PO_03_02	
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EQUAL TREATMENT POLICY

1. Purpose, Scope and Nature

The Equal Treatment Policy establishes the standards of MediCertLab Sp. z o.o. concerning respect for human dignity, equal treatment and the prevention of discrimination, workplace bullying, harassment, sexual harassment, intimidation, offensive conduct and retaliation.

The purpose of this Policy is to promote a working and collaborative environment based on mutual respect, safety, constructive communication, equal opportunities and personal responsibility for one's conduct.

This Policy applies to members of the governing bodies of MediCertLab Sp. z o.o., employees, associates, job applicants, trainees, interns and other persons performing tasks on behalf of MediCertLab Sp. z o.o. The expected standards of conduct also apply to customers, event participants, suppliers, subcontractors, partners and visitors to the extent relevant to their interactions with MediCertLab Sp. z o.o.

For persons who are not employees, this Policy establishes the expected standards of conduct. Binding obligations and available measures arise from applicable laws, contracts, regulations, terms and conditions of service or other arrangements.

This Policy does not create an employment relationship or grant employment-related rights to persons whose relationship with MediCertLab Sp. z o.o. is of a different nature.

This Policy applies regardless of the location or form of interaction related to work, cooperation or representation of MediCertLab Sp. z o.o., including remote work, business travel, meetings, events and electronic communication.

This Policy establishes general standards and preventive measures. It does not constitute a guarantee that all undesirable conduct will be completely eliminated, nor does it independently extend rights, obligations or liability beyond the scope arising from applicable laws, contracts and regulations.

It does not limit any rights that cannot lawfully be excluded or restricted.

2. Principles of Equal Treatment and Respect for Human Dignity

MediCertLab Sp. z o.o. takes measures appropriate to the nature of its activities and identified risks to promote respect for human dignity, equal treatment and the prevention of workplace bullying and other conduct that violates the established standards.

Decisions concerning recruitment, employment, cooperation, assignment of duties, remuneration, access to information, performance assessment and professional development should be based on criteria objectively relevant to the circumstances, such as competence, experience, scope of responsibility, quality of work, performance, legal requirements, safety and justified organisational needs, without unjustified differential treatment based on characteristics or circumstances protected by law.

Differences in treatment do not, in themselves, constitute a violation of this Policy where they are objectively and lawfully justified, appropriate to the nature of the work or cooperation, and proportionate to a legitimate aim.

Discrimination, harassment, sexual harassment and workplace bullying are assessed in accordance with the legal requirements applicable to the relevant relationship and based on all the circumstances of the case.

Conduct that does not meet every element of a particular legal definition may nevertheless violate the standards of dignity, respect and safety adopted by MediCertLab Sp. z o.o.

Justified feedback, objective assessment of work quality, enforcement of duties, compliance monitoring, refusal to accept improperly performed work, changes to work organisation or other lawful organisational decisions do not, in themselves, constitute discrimination, workplace bullying or harassment.

However, such actions should remain factual, proportionate, free from retaliation and respectful of the individual's dignity.

3. Prohibited Conduct

The following conduct is prohibited in particular:

- discrimination, harassment, sexual harassment, workplace bullying, intimidation or persistent violation of another person's personal boundaries;
- insults, humiliation, ridicule, threats, aggression, deliberate isolation or exclusion;
- unwanted physical, verbal or electronic contact, and the distribution of content that violates dignity, privacy or safety;
- unjustified unequal treatment unrelated to the requirements of the particular situation;
- encouraging others to violate this Policy, obstructing the investigation of a matter, concealing, destroying or falsifying materials, or knowingly providing false information;
- retaliation against a person who had reasonable grounds to believe that the information reported was true, supported a reporting person or participated in the investigation of a matter.

4. Reporting and Responding to Concerns

A person who has experienced or witnessed a possible violation of this Policy may report the matter through an available communication channel appropriate to its nature.

A report may also concern a reasonable concern that a violation may occur.

The absence of some information does not prevent a report from being accepted. Anonymous reports may be assessed to the extent that their contents allow reasonable action to be taken. However, anonymity may limit the ability to obtain additional information, investigate the matter and provide feedback.

Upon receiving a report, MediCertLab Sp. z o.o. conducts an initial assessment of the nature of the matter, available information, potential risks to individuals and the need for protective or investigative measures.

The scope and sequence of actions are determined according to the significance, risks, legal basis, urgency and nature of the relationship between the parties concerned.

The submission of a report does not, in itself, establish that a violation has occurred.

The person concerned by the matter should be given an opportunity to present their position to the extent possible without compromising the safety of individuals, risking the loss or distortion of evidence, or interfering with the proper conduct of the investigation.

A person directly involved in the matter, affected by a conflict of interest or whose impartiality may reasonably be questioned shall not independently investigate or decide the matter.

MediCertLab Sp. z o.o. may seek assistance from a competent external person, particularly where justified by the complexity of the matter, the need to maintain impartiality, the protection of rights or legal risks.

Where justified by personal safety, information protection, preservation of evidence or business continuity, MediCertLab Sp. z o.o. may implement temporary and proportionate organisational measures, including separating individuals, modifying work arrangements, restricting access or temporarily removing a person from specific activities.

Such measures are not disciplinary penalties and do not determine the outcome of the matter or the liability of any individual.

Discussions, agreements concerning the terms of future cooperation or mediation may be considered only where the nature of the matter permits, participation is voluntary and the proposed solution does not expose any person to pressure, retaliation or further harm.

Information and findings shall be documented only to the extent necessary to assess the matter, make decisions, fulfil legal obligations and establish, exercise or defend rights.

Materials shall be protected against unauthorised access, modification or loss and retained for a period appropriate to the purpose, legal basis and risk of claims.

No additional records shall be created where the relevant information is already available in the secured documentation relating to the matter.

5. Confidentiality, Protection of Individuals and Liability

Access to information concerning a report shall be restricted to persons who require it to receive the report, protect individuals, preserve materials, investigate the matter, make decisions, obtain professional assistance or fulfil legal obligations.

MediCertLab Sp. z o.o. implements measures to protect privacy and confidentiality appropriate to the nature and risks of the matter.

However, complete anonymity or absolute non-disclosure of information cannot be guaranteed where the use or disclosure of information is necessary to properly investigate the matter, safeguard the rights of individuals, establish, exercise or defend rights, fulfil a legal obligation or take appropriate action.

Retaliation against a person who had reasonable grounds to believe that the information provided was true is prohibited.

The fact that a reported violation has not been substantiated does not, in itself, constitute evidence of bad faith.

This protection does not extend to knowingly providing false information, falsifying materials or deliberately acting with the intention of causing harm.

A finding of bad faith requires evidence that the person knew the information provided was false or knowingly used falsified materials.

Receipt of a report, preservation of materials, implementation of temporary measures, communication of information about a matter or seeking external assistance does not, in itself, constitute confirmation of a violation, acknowledgement of a claim or acceptance of liability by MediCertLab Sp. z o.o.

Actions taken following the investigation of a matter shall be based on the findings, applicable laws, the basis of employment or cooperation, and the actual scope of authority of MediCertLab Sp. z o.o.

This Policy does not independently establish grounds for penalties, compensation or financial liability.

6. Implementation and Maintenance of the Policy

The Management Board of MediCertLab Sp. z o.o. is responsible for establishing organisational arrangements that support the implementation of this Policy.

Persons managing, coordinating or representing MediCertLab Sp. z o.o. should lead by example and, within the scope of their competence, respond appropriately to conduct known to them that may constitute a serious violation.

Each person covered by this Policy is responsible for their own conduct, compliance with the established principles, cooperation in investigations to the required extent, protection of information and refraining from retaliation.

This Policy does not limit rights arising from applicable laws, contracts or regulations, or the possibility of referring a matter to a court, the National Labour Inspectorate (Państwowa Inspekcja Pracy), the data protection authority, law enforcement authorities or another competent institution.

This Policy does not replace a separate internal reporting procedure required under whistleblower protection legislation where the obligation to implement such a procedure arises.

Reports subject to specific legal requirements shall be handled in accordance with those requirements.

This Policy shall be updated where changes in applicable law, activities, organisational arrangements, risks or experience gained from its implementation materially affect its contents.

Changes in personnel, positions, communication channels or technical solutions do not require amendments to this Policy, provided that its fundamental principles remain applicable.

This Equal Treatment Policy has been established and approved by the Management Board of MediCertLab Sp. z o.o.