GENDER BALANCE POLICY

ON THE MANAGEMENT BOARD AND

SUPERVISORY BOARD OF

LPP S.A., WITH ITS REGISTERED OFFICE IN GDANSK

1. INTRODUCTION TO THE POLICY

1.1. LPP S.A., with its registered office in Gdańsk (hereinafter referred to as the "Company"), as a company whose shares are admitted to trading on a regulated market – the Warsaw Stock Exchange S.A. – undertakes to promote gender balance on the Management Board and the Supervisory Board, in accordance with the principles set out in particular in:

1.1.1. Directive (EU) 2022/2381 of the European Parliament and of the Council of 23 November 2022 on improving the gender balance among directors of listed companies and related measures (**'the Directive'**)

1.1.2. and the Act of 29 July 2005 on public offerings and the conditions **for** the admission of financial instruments to organised trading and on public companies (**"the Public Offering Act"**).

1.2. The aim of this Policy on Gender Balance on the Company's Management Board and Supervisory Board (**"the Policy**") is to ensure a fair and transparent recruitment process and to increase the representation of persons belonging to the under-represented gender in the Company's decision-making bodies.

1.3. This Policy sets out, in particular:

1.3.1. the rules governing the selection process for specific positions on the Management Board and the Supervisory Board, aimed at meeting the requirements set out in the section below. The Company strives to achieve gender balance within its governing bodies, understood as meeting the following criteria (the **'Gender Balance Target'** or the **'Target'**):

1.3.2. the rules for nominating candidates for the Company's Management Board and Supervisory Board, in matters not regulated by law or the provisions of the Company's Articles of Association,

1.3.3. career development programmes for women and men,

1.3.4. a human resources management strategy,

1.3.5. the rules for monitoring the achievement of the Gender Balance Target and for reporting.

1.4. This Policy is addressed to the Company's statutory bodies and its individual shareholders, to the extent that they influence the appointment of members to the Management Board or the Supervisory Board, in particular to:

1.4.1. the Company's General Meeting, to the extent that it influences:

(a) the appointment, dismissal and suspension of members of the Management Board;

(b) the appointment and dismissal of members of the Supervisory Board;

1.4.2. the Supervisory Board, to the extent that it influences the composition of the Management Board or the Supervisory Board, in particular through the power to:

(a) suspend members of the Management Board from their duties;

(b) delegate members of the Supervisory Board to temporarily perform the duties of members of the Management Board who are unable to carry out their duties;

(c) co-opting members of the Supervisory Board.

1.5. The rules governing the appointment of members of the Company's Management Board or Supervisory Board are set out in:

1.5.1. the Act of 15 September 2000 – the Commercial Companies Code (**'KSH'**);

1.5.2. the Public Offering Act and the Directive;

1.5.3. the Company's Articles of Association;

1.5.4. this Policy.

1.6. In this Policy, for the sake of simplicity, masculine grammatical forms (e.g. 'candidate') are used, which should be understood as referring equally to persons of both genders – both women and men. The use of the masculine form is purely for linguistic purposes.

1.7. Whenever this Policy refers to an under-represented gender, this is to be understood as the gender whose representatives hold no more than 49 per cent of the total number of positions on the Company's Management Board and Supervisory Board.

2. OBJECTIVE OF THE POLICY

2.1. The Company aims to achieve gender balance within its governing bodies, understood as meeting the following criteria (**'Gender Balance Objective'** or **'Objective'**):

2.1.1. achieving a total number of positions held on the Company's Management Board and Supervisory Board by members of the under-represented gender at a level no lower than the figure closest to 33 per cent of all positions; and

2.1.2. achieving a composition of the Company's Management Board and Supervisory Board such that, in both bodies, at least one position is held by a person of the under-represented gender.

2.2. The figure closest to 33 per cent of all positions on the Company's Management Board and Supervisory Board is determined in accordance with the Annex to the Directive.

2.3. The gender balance target will be achieved by applying the principle of equal opportunities in the selection of members of the Management Board and the Supervisory Board, and by fostering a culture of diversity within the organisation in accordance with the principles set out in detail in the Policy.

2.4. The gender balance objective shall be taken into account in every selection process for a position on the Management Board conducted from the date the Policy comes into force, regardless of whether the appointment is for a new term of office or to fill a vacancy in the body during the current term of office.

2.5. The principle set out in point 2.4 above applies mutatis mutandis to the selection of members of the Supervisory Board.

2.6. Should it become necessary to make changes to the composition of the Management Board or the Supervisory Board during the joint term of office of each of these bodies, which began at the earliest at the time of the adoption of this Policy, the Company shall take steps to bring it closer to achieving the gender balance target.

3. RULES FOR NOMINATING CANDIDATES AND CRITERIA FOR THEIR ASSESSMENT

3.1. The provisions set out in sections 3.1.1. to 3.1.6. below apply to the process of selecting candidates for positions on the Management Board and the Supervisory Board.

3.1.1. Before commencing the selection process for a position on the Company's governing bodies, the Company's current strategy, its key business objectives and needs, and the progress made towards achieving the Gender Balance Target will be analysed in order to determine the profile of a candidate who will be suitable and contribute to the realisation of the Company's long-term plans.

3.1.2. At every stage of the selection process for a specific position on the Company's Management Board or Supervisory Board (including during the preparation of any recruitment notices, at the initial candidate screening stage and at the stage of creating a pool of candidates), selection criteria shall be applied which should:

(a) be defined before the selection process begins,

(b) be applied in a non-discriminatory manner,

(c) be formulated in a neutral and unambiguous manner,

(d) take into account the candidates' qualifications, experience and competences, as well as the need to achieve the gender balance target.

3.1.3. Among other things, by publishing the Policy on the Company's website, the Company ensures that all persons authorised to fill positions on the Company's governing bodies and who are members of the bodies responsible for appointing members of the Management Board and the Supervisory Board are informed, prior to commencing the selection process for a position, of the content of this Policy, the criteria adopted and the need to achieve the gender balance objective

3.1.4. The Company may, depending on its needs and the current situation:

(a) take measures to identify, assess and develop individuals employed by the Company as potential candidates for positions on the Management Board and Supervisory Board as part of an internal recruitment process,

(b) conduct external recruitment, including encouraging individuals from outside the Company who possess the identified desired competences to participate in the recruitment process,

(c) use external agencies specialising in recruiting individuals for key positions.

3.1.5. Candidates for positions on the Company's Management Board and Supervisory Board are nominated by authorised bodies in accordance with the procedures and timeframes laid down by law and the provisions of the Company's Articles of Association.

3.1.6. When nominating a candidate for the Company's Management Board or Supervisory Board, the following must be provided:

(a) the candidate's necessary personal and contact details (such as: first name, surname, date of birth, gender, place of residence, telephone number, email address),

(b) the candidate's professional CV, detailing their education, qualifications and previous positions, together with a description of their professional career, and

(c) other documents and information required by law, the Public Offering Act and regulations issued pursuant thereto, or enabling the assessment of the nominated candidate in accordance with the Policy,

(d) a statement by the candidate consenting to the processing of their personal data by the Company, in accordance with the Company's policies.

3.2. In the process of selecting candidates for membership of the Company's Management Board, the following criteria in particular will be taken into account, adjusted as appropriate depending on the desired candidate profile:

(a) education: higher education, including that obtained abroad,

(b) field of study and areas of expertise, multidisciplinary background,

(c) proficiency in foreign languages (including English),

(d) knowledge and skills, including specialist knowledge (technical and sector-specific): arising from education, acquired through postgraduate studies, academic work or training; arising from professional qualifications or professional degrees, confirmed by certificates; and acquired in other ways during the candidate's professional career,

(e) professional experience and length of service: taking into account both the number of years and diversity across sectors; experience gained whilst performing specific functions or holding specific posts; experience related to management or supervision; international experience,

(f) gender: with regard to gender diversity, the aim is to achieve the gender balance target,

(g) other criteria identified by the Company and its authorised bodies as important and relevant for the assessment and selection of candidates, such as leadership, managerial and communication skills necessary to perform the role effectively; strategic thinking; knowledge and skills in finance, law, accounting and financial controlling; behavioural competences; competences

specific to the body or role; industry- or region-specific competences; networking skills.

3.3. At all times, the Management Board should comprise individuals possessing specialist competences in the following areas relevant to the Company's operations: management, finance and financial supervision, financial reporting, risk management, human resources management, sales, product development, marketing, technology, and other areas necessary for the achievement of the Company's objectives and strategy.

3.4. In the process of selecting candidates for membership of the Company's Supervisory Board, particular consideration will be given to:

(a) the criteria set out in point 3.2 of the Policy, adapted as appropriate to the desired candidate profile,

(b) knowledge and skills to the extent required by Article 129(1), second sentence, and Article 129(5) of the Act of 11 May 2017 on statutory auditors, audit firms and public oversight,

(c) the independence criteria set out in Article 129(3) and (4) of the Act of 11 May 2017 on Statutory Auditors, Audit Firms and Public Oversight,

(d) the absence of any actual and material links with a shareholder holding at least 5 per cent of the total number of votes in the Company.

3.5. Derogation from the criteria set out in points 3.4(b) to 3.4(d) above is permitted only if persons meeting those criteria have already been appointed to the Supervisory Board in sufficient numbers to satisfy the requirements and conditions laid down in statutory provisions or in the provisions of the corporate governance code, to the extent applied by the Company.

4. PRINCIPLES GOVERNING THE SELECTION PROCESS FOR POSITIONS ON THE COMPANY'S MANAGEMENT BOARD AND SUPERVISORY BOARD

4.1. Candidates nominated for positions on the Company's governing bodies are selected on the basis of a comparative assessment of each candidate against the adopted criteria, as applicable to the Management Board and the Supervisory Board respectively.

4.2. When assessing candidates for membership of the Company's governing bodies, the criteria relating to education, skills and professional experience shall be considered collectively, as interrelated areas, so that together they constitute a body of knowledge, skills and experience appropriate to the functions performed and the duties entrusted to a member of the Management Board or a member of the Supervisory Board.

4.3. In the case of candidates with equivalent comparative assessment results, priority shall be given to a person belonging to the under-represented gender, provided this is necessary to achieve the Gender Balance Target (this principle shall not apply if the Company has already achieved the Gender Balance Target), unless other diversity principles laid down in law, based on objective and non-discriminatory criteria and taking into account the candidate's specific circumstances, justify the selection of a candidate of the opposite sex.

4.4. In the event of a proposal to reappoint persons currently serving on the Management Board or the Supervisory Board for a further term of office, provided that the Gender Balance Target is met, the Company permits a waiver of the detailed selection of candidates and the launch of a new recruitment process, provided that the bodies or persons authorised to make the appointment assess that the persons currently holding these positions continue to provide a guarantee of the proper performance of their duties on the Management Board and the Supervisory Board. In the event that part of the Management Board or Supervisory Board is reappointed for a further term of office, the rules for the selection of candidates for positions on these bodies set out in this Policy shall apply to additional persons appointed to supplement the composition of the Management Board or Supervisory Board, taking into account the Gender Balance Objective.

4.5. At the request of a candidate who took part in the selection process but was not selected, the Company shall provide them, no later than 14 days from the date of receipt of the request, with: the eligibility criteria on which the selection was based; an objective comparative assessment of the candidates carried out on the basis of those criteria; and, in the event of a waiver of the priority referred to in point 4.3 — the reasons for such a waiver and the qualifications of the candidate selected for the post in question. The information shall be provided in either paper or electronic form.

4.6. The company shall document every selection process for a position on the Management Board or the Supervisory Board. The documentation shall include at least: candidates' applications together with the documents specified in point 3.1.6; the comparative assessment sheet for candidates; the justification for the selection and, in the case referred to in point 4.3, the justification for waiving priority.

4.7. The documentation of the selection process shall be retained for a period not shorter than the limitation period for claims referred to in Article 90gf of the Public Offering Act. The obligation to document arises

from Article 90gg(2) of that Act, pursuant to which, in proceedings initiated by a candidate, it is for the Company to demonstrate that it has not breached the selection rules.

5. CAREER DEVELOPMENT PROGRAMME

5.1. The Company implements a career development programme which serves, amongst other things, to ensure equal opportunities for career progression for people of all genders, comprising at least the following measures:

5.1.1. the development of a diversity policy based on principles and values that foster an open, inclusive and dynamic working environment,

5.1.2. maintaining a transparent system for identifying talent in managerial roles – involving the periodic assessment of employees' professional potential and the achievement of their objectives, conducted on the basis of objective criteria, whilst ensuring equal opportunities for women and men in accessing managerial positions,

5.1.3. individual development plans for those in managerial roles – developing and implementing personalised competence development pathways following periodic competence assessments,

5.1.4. organising initiatives to support the development of leadership and managerial competences, involving mentors with management experience,

5.1.5. promoting internal recruitment, establishing talent programmes and reviewing them periodically;

5.1.6. equal access to training – ensuring equal opportunities for all staff to participate in development training and activities aimed at enhancing professional qualifications, regardless of gender,

5.1.7. monitoring and reporting – regularly monitoring progress regarding the representation of women and men at various levels of the organisational structure and publishing the results in the annual report on the implementation of the Policy.

6. HUMAN RESOURCES MANAGEMENT STRATEGY

6.1. The Company implements a human resources management strategy whose key objective is to achieve and maintain a balanced representation of women and men at all levels of the organisational structure – with particular emphasis on managerial and executive positions.

6.2. The human resources management strategy may be implemented, in particular, by undertaking measures such as:

6.2.1. taking the principle of gender balance into account in recruitment, including through gender-neutral job advertisements and the involvement of diverse recruitment teams,

6.2.2. ensuring transparency in promotions, including identifying and reducing systemic barriers that may affect the representation of women and men in senior positions,

6.2.3. setting and monitoring targets or indicators relating to the representation of women and men in decision-making bodies,

6.2.4. fostering an organisational culture that supports gender balance, including promoting attitudes of equal treatment and the conscious management of gender stereotypes,

6.2.5. incorporating the themes of diversity, equality and countering unconscious bias into educational activities, in particular in training or development programmes for managers and staff,

6.2.6. collecting and analysing data on employees, their skills, competences and the assessment of their potential and achievement of objectives, to the extent permitted by law,

6.2.7. monitoring HR data to the extent relevant to the achievement of the Policy's objectives.

7. MONITORING AND REPORTING

7.1. To ensure the effective implementation of the Gender Balance Objective, the Company undertakes to carry out systematic monitoring and reporting on progress towards the Policy's objectives.

7.2. Should any irregularities be identified, the Company's Management Board may:

7.2.1. draw up a corrective action plan, the implementation of which will be monitored in subsequent reports;

7.2.2. submit to the General Meeting a proposal for changes to the Company's corporate governance,

relating in particular to the rules for nominating candidates and appointing members of the Management Board and the Supervisory Board, or changes to the number of members of the Company's individual governing bodies.

7.3. The Company's Management Board shall draw up an annual report on the representation of each gender on the Company's governing bodies and the measures taken to achieve the gender balance objective **('the Report'**), although the Management Board may entrust the preparation of the Report to the Supervisory Board. The Report may constitute a separate section of the report on the Company's activities referred to in Article 49(1) of the Accounting Act of 29 September 1994.

7.4. The Company shall make the Report available on its website.

8. FINAL PROVISIONS

8.1. This Policy shall apply without prejudice to mandatory provisions of law. In matters not covered by this Policy, generally applicable provisions of law and the Company's internal regulations shall apply.

8.2. This Policy is subject to regular reviews and updates to ensure its compliance with applicable laws and best market practices.

8.3. The Company makes the Policy available on its website, together with information on the legal regulations in force regarding gender balance and on the sanctions for breaching the obligations set out in the Public Offering Act.

8.4. The Policy was adopted by the Company's Supervisory Board on the basis of an authorisation granted by the Company's General Meeting by a resolution dated 10 July 2026. The Policy has been in force since 16 September 2026.

8.5. Any amendments to the Policy require a resolution of the Company's Supervisory Board.