

**POLICY**  
**OF EQUAL OPPORTUNITIES AND**  
**CULTURAL DIVERSITY**

Kyiv 2024

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Address of Director General

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## **ADDRESS OF DIRECTOR GENERAL**

Dear employees,

Creating a culture of diversity, equal opportunities, inclusion and non-discrimination is the basic foundation of organisation and activities of groups of people in the modern world. With this Policy, Ukrposhta would like to emphasise its commitment to the principles of equality, inclusion, diversity, fair and impartial treatment, equal opportunities, openness and respect for the exchange of different views. I am convinced that the vast majority of you share these principles and already follow these rules, even if they have not been formally declared and approved. I am confident that the principles approved by this Policy will help to achieve the Company's goals by creating a favourable corporate culture, unlocking the maximum creative potential and professional fulfilment of each employee.

**Ihor SMELYANSKY,**  
Director General  
of JSC Ukrposhta

# INTRODUCTION

**The Policy of Equal Opportunities and Cultural Diversity** is a policy aimed at ensuring equal opportunities for all its employees, and the absence of discrimination in any aspect of employment on the basis of race, religion, skin colour, ethnic or national origin, age, disability, sexual orientation, political beliefs, gender and marital status. As a result of this Policy, no employee will be subjected to physical, sexual, racial, psychological, verbal or other discrimination, harassment or abuse.

## 1. MISSION

To provide quality, simple and accessible services, erasing the boundaries between people, countries, cities and villages. By changing ourselves, we change the country for the better.

## 2. Vision

To build a company that simplifies the life of every customer and contributes to the success of business, employees and shareholders. A company that makes Ukraine proud.

## 3. CORPORATE VALUES

- ✓ **Success is cool.** Each of us is responsible for success: personal, team, company and country success. This is what inspires us to new victories.
- ✓ **Change is a necessity.** We recognise the importance of innovation and are ready to constantly evolve to meet the times and needs of our customers.
- ✓ **Being honest is easy.** We do not tolerate theft and corruption at all levels. We value the trust of our colleagues, clients and partners and do everything we can to justify it.
- ✓ **Simplicity is our choice.** We want to be simple in communication, products and services. That's why we remove the unnecessary, leaving only what the client needs.
- ✓ **We are the team.** There are many of us, we are different, but in all our actions we focus on a common goal, respect each other, support and motivate by example.

## 4. DEFINITIONS

- ✓ **Equality** means ensuring that everyone has equal access to opportunities, resources and benefits, and is treated fairly and with respect without discrimination or prejudice.
- ✓ **Diversity** is the acceptance and appreciation of people's differences in characteristics, backgrounds, experiences and perspectives, including, but not limited to, race, ethnicity, nationality, religion, gender, sexual orientation, disability, age, socioeconomic status and cultural background.
- ✓ **Inclusion** is the creation of an environment where all people feel valued, respected and supported, and their contributions are recognised and valued, promoting a sense of belonging and active participation.
- ✓ **Discrimination** means treating someone less favourably because of a particular characteristic or imposing conditions or requirements that disproportionately affect people with certain specific characteristics.
- ✓ **Harassment** means unwanted behaviour related to a particular characteristic, the purpose or effect of which is to violate a person's dignity or create an intimidating, hostile, humiliating or offensive environment.
- ✓ **Victimisation** is the unfavourable treatment of a person because they have made a complaint, supported someone else's complaint, or participated in any proceedings related to equality, diversity and inclusion.

## 5. KEY PRINCIPLES AND PROVISIONS

JSC Ukrposhta is a responsible organisation that respects the enshrined principles of human rights recognised by the international community, in particular the UN Universal Declaration of Human Rights, the 10 principles of the UN Global Compact and ILO Conventions (No. 100, 103, 111, 156), and in its activities acts in full compliance with the current Ukrainian legal requirements (including the Labour Code, the Law of Ukraine On Principles of Prevention and Combating Discrimination in Ukraine, the Law of Ukraine On Employment of the Population, the Law of Ukraine On Ensuring Equal Rights and Opportunities for Men and Women, etc.)

This Policy applies to all employees of JSC Ukrposhta, including employees, temporary workers, contractors, visitors and any other persons involved in the company's activities, regardless of their race, colour, ethnic origin, national origin, religion, sex, gender identity or appearance, sexual orientation, disability, age, marital status or any other characteristic protected by the legislation of Ukraine.

JSC Ukrposhta seeks and actively encourages:

- ✓ **creating an inclusive and diverse community** that values and respects individual differences and promotes equality of opportunity for all;
- ✓ **removing barriers** that prevent the full participation and meeting the needs of people with disabilities and people with reduced mobility;
- ✓ **recruiting**, engaging and promoting **individuals from underrepresented groups**, including but not limited to women, ethnic minorities, LGBTQ+ individuals, people with disabilities and people from different socio-economic backgrounds;
- ✓ **ensuring fair treatment** of employees on the basis of merit in all aspects of employment, recruitment, compensation and benefits, training, promotion, transfer and dismissal;
- ✓ **providing equal opportunities** for employment, promotion or retirement regardless of race, colour, gender, age, social status, religion, habits, sexual orientation, political views or disability, subject to the necessary requirements inherent in a particular position in the company.
- ✓ **respect, tolerance and understanding, cooperation and exchange of different views.**

JSC Ukrposhta strictly prohibits:

- ✓ discrimination, harassment and victimisation on the basis of any specific distinctive characteristic defined and protected by the legislation of Ukraine;
- ✓ harassment through threats, intimidation or coercion, which also includes remarks, ridicule and mockery (e.g., based on race or ethnicity);
- ✓ demands for sexual favours of any kind, the consent or refusal of which is used as a basis for making decisions related to the performance of official duties;
- ✓ the use or justification of forced and compulsory labour in any of our activities.

JSC Ukrposhta recognises the principles of equal opportunities, gender equality, inclusion and diversity as a value and strives to implement them at all levels of its operations.

We expect that all persons involved in the company's activities will adhere to and support the principles of this policy, treating others with dignity, respect, fairness and actively contribute to the creation of a tolerant and inclusive environment. JSC Ukrposhta will use its influence to encourage our partners, suppliers and customers to comply with the above principles.

The Company will ensure compliance with all equality legislation and that employees have the right to formally complain about violations of this policy without being punished. The Company guarantees all employees a fair consideration of their complaints and feedback on the results of their complaints.

## 6. ENSURING THE POLICY PRINCIPLES

The health, safety and well-being of our employees are the top priority in the activities of JSC Ukrposhta. The company's activities are carried out in full compliance with the requirements of the current legislation in the field of occupational health and safety. In addition, the company takes all appropriate and practical measures to ensure a safe working environment and psychological comfort for all employees.

JSC Ukrposhta:

- ✓ Ensures equal conditions for hiring and promotions of employees. No personal factors of an employee that are not related to work may be taken into account when making decisions on hiring or transferring to another position, as this would be considered discrimination.
- ✓ does not specify requirements when describing vacancies that may serve as a reason for discrimination against candidates: age, gender, appearance, etc.;
- ✓ does not give preference to women or men in the process of hiring and firing employees, encourages the hiring of women and men in industries that are not considered "typical" for their gender;
- ✓ Provides all employees with equal access to training, advanced training and professional development through all training and development tools available in the company.
- ✓ applies a unified and fair approach to employee performance evaluation based on personal contribution to overall results and professional qualifications.
- ✓ raises awareness of employees of the principles of equal opportunities and non-discrimination reflected in this policy by organising and conducting special trainings, exchanges of views/experiences, and through electronic means of communication (newsletters, corporate social networks, etc.).
- ✓ works to improve the quality of internal processes and management in the field of equal opportunities and non-discrimination policy.

The Company respects the uniqueness of each employee, recognises the talent of each employee and promotes unity in teamwork to achieve corporate and social goals.



## 7. PARTICIPANTS IN THE PROCESS, THEIR ROLES AND RESPONSIBILITIES

The management and collegial governing bodies of JSC Ukrposhta, including the Supervisory Board, management committees, the Director General and line managers at all levels of management, are responsible for observing the principles of equal opportunities and cultural diversity, and for promoting the integration of the principles of inclusiveness and non-discrimination in all aspects of the company's activities.

- ✓ **The Nomination and Remuneration Committee** of the Supervisory Board of the Company decides on the methods of responding to situations of violation of this Policy; approves any exclusions from the policy (e.g. situations where positive discrimination is possible); reviews the statistics and nature of complaints from employees regarding violations of the principles of this Policy and the results of training passing by the Company's employees; monitors the compliance of the Company's management with the principles of this Policy; provides recommendations for improving the approach and practices of equal opportunities and cultural diversity. Nominations and Remuneration Committee serves as the highest point of escalation for any conflicts that failed to find its resolution within the established whistleblowing and complaints procedures established by the management, as well as Nominations and Remuneration Committee is involved in any Policy violations where any of the top managers of the Company are involved.
- ✓ **General Director** is responsible for implementing the provisions of the Policy throughout the Company; organises employee training and ensures that Company's employees are trained, reports to the Supervisory Board on the results of training passing and statistics and nature of complaints received for consideration; raises any potential areas where positive discrimination is needed and approves such exclusions from the policy with the Nomination and Remuneration Committee.
- ✓ **Managers at all levels** are responsible for implementing the requirements of the Policy within their functional areas; control the awareness of employees and ensure that employees pass training; control prevent potential situations of violation of the Policy requirements in the course of their activities; inform subordinates about the prevention of discrimination, harassment, bullying in the course of performing their duties. Managers are responsible for ensuring that all the new employees pass the required policy training within their onboarding process.
- ✓ **Employees at all levels** are responsible for strict adhering to the policy, for raising their personal concerns, as well as for whistleblowing any concerns where they believe Policy might be in breach by other employees through established whistleblowing channels.

A person who has reason to believe that he or she has been subjected to discrimination, harassment or bullying should warn the party he or she considers to be the offender that the relevant behaviour violates the Equal Opportunities and Cultural Diversity Policy, which may result in a complaint to the General Director and [compliance@ukrposhta.ua](mailto:compliance@ukrposhta.ua)

Individuals who believe that they have been subjected to or witnessed any form of discrimination, harassment or victimisation are encouraged to immediately report violations of the principles of this policy to the Director General of JSC Ukrposhta and [compliance@ukrposhta.ua](mailto:compliance@ukrposhta.ua)

No dismissal or coercion to dismiss, disciplinary action or other negative measures of influence (transfer, certification (re-certification), change of working conditions, refusal to appoint to a higher position, reduction of salary, etc.) shall be applied in connection with the notification by an employee of the company of a violation of the requirements of this Policy.

All complaints and appeals will be promptly reviewed, taking into account the rights of all parties involved, necessary and impartial investigations will be conducted, and all necessary measures will be taken to eliminate violations.

## **8. Policy Delivery Controls**

The following metrics need to be reported to the Nominations and Remuneration Committee as a control instrument for reviewing Policy delivery.

### **On an annual basis:**

- Percentage of employees that are trained on understanding the policy;
- Volume and categories of complaints, nature of complaints, typical resolutions;
- Structure of the work force and key attributes comparing key areas of sensitivity to the general country population – e.g. proportions of employees by gender, cultural diversity, disabilities vs Ukrainian population in general in case of availability;
- Proportion of offices and branches with wheelchair accessibility for employees.

### **As soon as become known:**

- Any external or publicly mentioned cases of Policy breach;
- Any cases of Policy breach or suspected Policy breach where top management of the company is involved;
- Any whistleblowing or complaints cases where established procedures failed to resolve the issue and employee insists on getting the matter escalated to the Supervisory Board;
- Any exclusions from the Policy – e.g. allowance to apply positive discrimination in certain decision making processes.