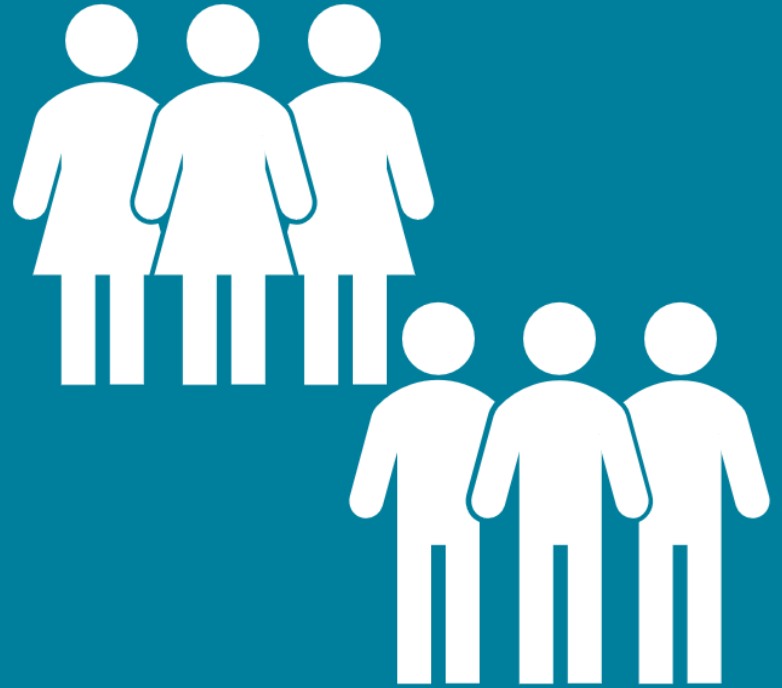


KERNEL

Anti-discrimination Policy



Kyiv, April 2021

Policy Objectives



- ☑ Kernel's Anti-discrimination Policy explains how the company prevents discrimination and protects its employees, counterparties, customers and stakeholders from unlawful harassment and discrimination
- ☑ The anti-discrimination policy supports the Company's overall commitment to creating safe and diverse jobs for all.
- ☑ Kernel creates a work environment in which all employees are treated with respect and dignity
- ☑ Kernel makes every effort to ensure that all stakeholders are aware of this policy and understand that any allegations of violations will be properly addressed and will be investigated.
- ☑ Kernel's law and policy prohibit inappropriate treatment based on sex or any other criterion regarding employment conditions, working conditions, privileges, etc.
- ☑ This policy applies to all employees, contractors, customers and stakeholders

Elements



- ✓ Discrimination - any negative action directed at a person, or attitude towards him on certain grounds including:
 - Age
 - Race
 - Sex
 - Religion
 - Ethnicity / nationality
 - Disability / medical history
 - Marriage / civil partnership
 - Pregnancy / motherhood / fatherhood
 - Gender identity / sexual orientation

- ✓ Harassment - intimidation, direct insults, malicious gossip and harassment, abusive sexual acts, whether expressed verbally (threats, intimidation, obscene remarks) or physically (touching, slapping), humiliating or insulting persons in a relationship of employment

- ✓ Gender-based violence - acts directed against persons because of their sex or customs or traditions prevalent in society (stereotypes about the social functions (position, responsibilities, etc.) of women and men), or acts that affect mainly persons of a certain sex or affect disproportionately causing physical, sexual, psychological or economic harm or suffering, including threats of such action, in professional, public or private life

General principles



- ☑ Kernel's policy is to ensure equal employment opportunities without discrimination or harassment based on race, color, religion, sex, sexual orientation, gender identity or self-expression, age, disability, marital status, citizenship, national origin, genetic information or any other characteristics that are protected by law
- ☑ Every employee has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits illegal discriminatory practices, including harassment. Therefore, Kernel expects that all relations between colleagues will be businesslike and free from obvious prejudices and demands.

Concept



- ❑ Any employee who has questions about the application of the provisions of this policy may seek clarification from the Head of the Personnel Department, the Head of the Department, Compliance or Compliance-coordinator at Kernel
- ❑ It is recommended to report all anticipated (possible) cases of discrimination or harassment
- ❑ Kernel's policy is to investigate such reports quickly and thoroughly
- ❑ Kernel prohibits harassment of anyone who reports or participates in the investigation of discrimination or harassment

Relationship management system



The company implements measures to prevent and combat violence:

1. Ensuring equal rights and opportunities for women and men in labor relations and working conditions
2. Ensuring awareness of gender equality, non-violent behavior, mutual respect and equal distribution of professional responsibilities between women and men
3. Conducting internal and external communications, approving the Kernel Corporate Code and other corporate standards to prevent gender-based violence, including all forms of violence against women, and fostering respect for the dignity of every employee regardless of gender
4. Study the situation and collect data on the facts of violence
5. Consideration of the facts, causes and preconditions for the spread of gender-based violence, as well as the effectiveness of measures to prevent and combat such violence
6. Investigation of gender-based violence, its consequences, and disciplinary punishment of violators
7. Involvement of heads of KERNEL structural subdivisions and the company's enterprises in conducting communications and implementing corrective actions aimed at preventing and counteracting violence
8. Conducting specialized trainings for the Company's employees and stakeholders
9. Providing immediate notice of potential violence and wrongdoing to the Kernel Hotline
10. Providing assistance and protection to victims

Summary



- ❑ The policy is subject to update if necessary, due to changes in current legislation, but at least once every three years

- ❑ **Process owner:** Head of Personnel Department

- ❑ **Policy Developer:** Compliance Officer

- ❑ Unacceptable actions in accordance with the Conflict of Interest Management and Anti-Fraud and Corruption Policy

- ❑ **Related documents:**
 - Corporate Code
 - Conflict of interest management policy and anti-fraud and corruption
 - A policy of equal opportunities and diversity
 - HR Policy
 - Corporate social responsibility and sustainable development policy
 - Procedure for receiving and reviewing information received through the Hotline
 - Procedure for conducting internal (corporate) investigations
 - Whistleblowers protection procedure