

Anti-Discrimination and Anti-Slavery Policy

1 INTRODUCTION

- 1.1 Accolade is committed to fostering, cultivating, and preserving a culture of diversity, equity, and inclusion. **Our human capital is the most valuable asset we have.** The collective sum of the individual differences, life experiences, knowledge, innovation, self-expression, and talent that our employees invest in their work represents a significant part of not only our culture but our reputation and Accolade's achievement as well.
- 1.2 Accolade is committed to conducting its business in a lawful and ethical manner, which includes ensuring that our supply chains are free from child labour, forced labour, and human trafficking. We recognize that these practices are a violation of fundamental human rights and are against international and local laws. Accolade strictly prohibits the use of child labour, forced labour, and human trafficking in any part of our operations or supply chains. This policy outlines our approach to identifying and preventing these unethical practices in our business activities.

2 SCOPE AND PURPOSE

- 2.1 This policy applies to all employees of Accolade. It covers Accolade's endeavours to embrace and encourage its employees' differences in all characteristics that make the employees unique. Accolade's diversity initiatives are applicable, but not limited to, our practices and policies in recruitment process as a whole; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; and the ongoing development of a work environment. It is built on the premise of full diversity equity that encourages and enforces:
- (a) Respectful communication and cooperation between all employees.
 - (b) Teamwork and employee participation, permitting the representation of all groups and employee perspectives.
 - (c) Work/life balance through flexible work schedules to accommodate employees' varying needs.
 - (d) Employer and employee contributions to the communities we serve to promote a greater understanding and respect for the diversity.
- 2.2 All employees of Accolade have a responsibility to treat others with dignity and respect at all times. All employees are expected to exhibit conduct that reflects inclusion during work, at work functions on or off the work site, and at all other Accolade-sponsored and participative events.
- 2.3 The provisions of this policy concerned with child labour, forced labour & human trafficking in supply chain apply to all employees, contractors, suppliers, and other business partners of Accolade, regardless of their position, location, or the nature of their affiliation with Accolade ("**Associated Persons**"). They apply to all aspects of our operations, including real estate investment, development, management, procurement, and any other business activities.

3 NON-DISCRIMINATION

- 3.1 The policy on non-discrimination is straightforward: We do not discriminate on the basis of race, colour, religion, national origin, sex (including pregnancy and gender identity), age, disability, political affiliation, trade union membership, marital status, sexual orientation, philosophical belief or other non-merit factor. This policy applies to all terms and conditions of employment,

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including but not limited to hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation, and training.

4 ANTI-HARASSMENT

- 4.1 Harassment, in any form, is a violation of this policy and will not be tolerated. Harassment is defined as any unwanted and intrusive conduct that causes distress, fear, or harm to an individual. Harassment becomes unlawful where enduring the offensive conduct becomes a condition of continued employment, or the conduct is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile, or abusive.

5 DIVERSITY, EQUITY, AND INCLUSION

- 5.1 Diversity, equity, and inclusion are integral components of the corporate culture at Accolade. We are committed to:
- (a) Building a diverse workforce that reflects the communities we serve.
 - (b) Creating an inclusive environment where all employees feel valued and can contribute to their fullest potential.
 - (c) Implementing fair and equitable policies and practices in all aspects of employment.
 - (d) Providing opportunities for professional growth and advancement for all employees, especially those from underrepresented groups.

6 EMPLOYEE EVALUATION

- 6.1 Accolade undertakes to conduct an employee evaluation at least once a year. The goals set for the employee to achieve must be established in a clear, documented manner between the supervisor and the employee. It is mandatory for the employee to receive from the supervisor, feedback on their work results and the achievement of the set goals.
- 6.2 Accolade maintains competitive salaries. Remuneration decisions are based solely on professional performance, beginning from the outset of the recruitment process.

7 PROHIBITED BEHAVIOUR

- 7.1 **Child Labour:** Employment of children in any work that deprives them of their childhood, interferes with their ability to attend regular school, or is mentally, physically, socially, or morally harmful.
- 7.2 **Forced Labour:** Any work or service that a person is not performing voluntarily and is made to do under the threat of penalty or coercion.
- 7.3 **Human Trafficking:** The act of recruiting, transporting, transferring, harbouring, or receiving persons through the use of force, fraud, or coercion for the purpose of exploitation.

8 COMPLIANCE WITH LAWS AND STANDARDS

- 8.1 Accolade will comply with all applicable local and international laws and standards regarding child labour, forced labour, and human trafficking. We will also adhere to the principles set forth

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in the United Nations Global Compact, the Fundamental Principles and Rights at Work as defined by the International Labour Organization, and the Universal Declaration of Human Rights.

9 DUE DILIGENCE AND RISK ASSESSMENT

- 9.1 Accolade will conduct due diligence on all new suppliers and regularly assess existing suppliers to ensure compliance with this policy. This will include:
- (a) Evaluating the potential risks for child labour, forced labour, and human trafficking in our supply chains.
 - (b) Requiring suppliers to certify that they comply with our standards regarding child labour, forced labour, and human trafficking.

10 BUSINESS PARTNERS CODE OF CONDUCT

- 10.1 All suppliers of Accolade must adhere to our Business Partners Code of Conduct, which includes the following commitments:
- (a) No use of child labour or forced labour in any of their operations.
 - (b) No engagement in or support for human trafficking.
 - (c) Provision of fair wages and working hours for all employees.
 - (d) Respect for the right of all workers to a safe and healthy work environment.

11 TRAINING AND COMMUNICATION

- 11.1 Accolade will provide training to all employees to ensure they understand their rights and responsibilities under this policy. This training will include topics such as recognizing harassment, diversity awareness, and how to report incidents of discrimination and harassment.
- 11.2 Accolade will provide proper training to support professional development of its employees. The employees should use the offered tools and knowledge training for the purpose of continuous professional development.
- 11.3 Accolade will provide training to its employees and management who have direct responsibility for supply chain management to ensure they understand the risks of child labour, forced labour, and human trafficking in our supply chains and how to mitigate them.

12 VIOLATION OF THIS POLICY

- 12.1 Any employee who believes they have been the victim of discrimination or harassment is encouraged to report the incident immediately using the procedures set out in the **Whistleblowing Policy** of Accolade. All complaints will be treated with sensitivity, discretion, and confidentiality to the extent allowed by the Whistleblowing Policy and the law. Any Associated Person suspecting violation of this policy relating to prohibited behaviour is also encouraged to report such violation.
- 12.2 Any employee found to have exhibited any inappropriate conduct or behaviour against others may be subject to disciplinary action. Employees, managers, and team leaders are required to

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cooperate in any investigation of a discrimination or harassment complaint.

- 12.3 If a violation of this policy regarding prohibited behaviour is found, Accolade will take immediate action to remediate the situation. This may include working with the supplier to correct the issue, providing support for victims, and/or adopting appropriate measures in the employment/business relationship.
- 12.4 Making false claims regarding discrimination, bullying, harassment, sexual misconduct, or retaliation is a serious matter. When an individual knowingly presents such allegations falsely, or if the claims are put forth with malicious intent or in bad faith, it represents a serious misuse of the policies designed to protect individuals from these behaviours. Engaging in this type of misconduct by misrepresenting the truth can undermine the integrity of the policy and the safety it is intended to ensure. As a result, those who misuse the policy in this manner will be subject to disciplinary measures. The intent behind this stipulation is to maintain a just and secure environment where genuine concerns can be addressed appropriately, without being undermined by dishonest or malicious claims.

13 FINAL PROVISIONS

- 13.1 Accolade is an equal opportunity employer. We are dedicated to providing a work environment free from discrimination and harassment, where employees are treated with respect and dignity. This policy is a critical component of our commitment to creating a truly inclusive workplace.
- 13.2 Accolade is concurrently committed to continuously improving our practices to prevent child labour, forced labour, and human trafficking in our supply chains. By implementing this policy, Accolade reaffirms its commitment to ethical business conduct and the protection of human rights throughout its supply chains.
- 13.3 Accolade remains steadfast in its commitment to uphold human rights by ensuring our supply chains are devoid of any form of modern slavery. Through rigorous due diligence, continuous improvement, and strict enforcement of this policy, we are dedicated to fostering ethical business practices and safeguarding the welfare of individuals in our operations and beyond. We call upon all Associated Persons to actively engage in this endeavour, as we work together to maintain the integrity of our supply chains and the dignity of all workers.
- 13.4 The COO and the Group Legal Counsel of Accolade shall ensure that regularly, not less than every two years, this policy is revisited and reevaluated in light of development of Accolade's business and applicable laws.
- 13.5 This Policy was reviewed by the COO and the Group Legal Counsel of Accolade and approved by the Board of Directors of Accolade Holding, a.s. as the parent company of Accolade on 30 June 2025.