

Title space

Recruitment Policy

Krakow, June 2026

ailleron 

Table of contents

1. Objective.....	1
2. Scope.....	1
3. Equal Employment Opportunity.....	1
4. Recruitment Process.....	1
5. Confidentiality	4
6. Offer Letter	4
7. Acceptance and Onboarding.....	4
8. Notification to Unsuccessful Candidates and Position Closure	6
8.1 Notification to unsuccessful candidates.....	6
8.2 Closing a position after hiring a candidate	6
9. Feedback and Continuous Improvement.....	7
10. Policy Review	7
11. Implementation	7
12. Contact Information	7

1. Objective

The purpose of this Recruitment Policy is to establish guidelines and procedures for the recruitment and selection of employees at Ailleron S.A. and Ailleron Outsourcing Services sp. z o.o. ("Ailleron"), covering the entire process from start to finish, for all units. The policy aims to ensure a fair, transparent and efficient hiring process, with the aim of building a talented and diverse team that will contribute to our continued success.

2. Scope

This policy applies to all hiring activities conducted by Ailleron for permanent, temporary and trainee positions, regardless of the level or department.

3. Equal Employment Opportunity

Ailleron is committed to providing equal employment opportunities to all individuals, regardless of race, color, religion, sex, national origin, age, disability or any other legally protected status. The organization will not tolerate discrimination in any aspect of the recruitment and selection process. In accordance with the provisions of applicable Group's internal procedures, every person who has knowledge of such violation should immediately report the incident, indicating the circumstances of the situation. Reports can be submitted through the platform available at the Internet address indicated on the Company's website.

4. Recruitment Process

1. **REQUEST FOR A NEW POSITION:** The process begins with the submission of a formal request by a Hiring Manager (e.g., Chief Operating Officer, General Manager, Internal Department Heads). This request is submitted to the recruitment team to create a new position in the project overseen by the applicant. The application should include critical information such as job title, the number of openings, project specifics, salary ranges, and the required and desired qualifications.

2. JOB POSTING: Vacancies will be posted internally and/or externally to attract a diverse pool of qualified candidates. Job descriptions and requirements will be clear and accurate. Exceptions can be applied.
3. APPLICATION REVIEW: All applications will be reviewed objectively and according to the job requirements. Only candidates who meet the minimum qualifications will be considered for further evaluation.
4. INTERVIEW PROCES: Interviews will be conducted by trained interviewers assigned to each opening. Candidates will be asked job-related questions, and evaluations will be based on skills and qualifications.
5. ASSESSMENT AND TESTING: If applicable, assessments and tests will be administered consistently to assess a candidate's abilities and competencies related to the job. These tests can be administered by the Ailleron team or by the client, according to the interview path defined for each opening. In all cases, the recruitment team will request thorough feedback to be able to share valuable feedback with both the candidate and the client. Feedback shall include the following items:
 - Recommendation – specify seniority.
 - Positive Aspects - in addition to the required technology, highlight if the candidate has knowledge or experience in any additional technology or any notable attitude or experience (e.g.: proactivity, willingness to learn, autonomy).
 - Areas for Improvement - if there are any.
 - Conclusion and Feedback - whether the candidate is suitable for the project or not and explaining the reasons behind the decision.
6. ID CHECK: [If necessary] Once a candidate has successfully passed the initial screening and interview stages and being considered for employment, an ID check is conducted by the recruiter or appointed representative (Payroll department, PMO, etc.). The primary purpose of this check is to ensure that the candidate's identity matches the information provided in their application and throughout the recruitment process.

BACKGROUND CHECK: [If necessary] A background check will be conducted for final candidates to verify their employment history, qualifications and suitability for the role. Background checks shall be performed only if required by law in connection with filling the position. The need for additional verification of candidates will arise, among others, when the recruitment is for a position related to outsourcing to credit institutions, investment companies, banks or financial sector entities. The scope of the background check will depend on the scope of

the service (activity) to be outsourced, the access granted to prospective employees, and requirements such as those imposed on employees of credit institutions, investment firms, banks or financial sector entities, if the service (activity) in question would not be outsourced and would be performed by them independently. The background check might include some of the following areas, as permitted by applicable laws and regulations:

- Criminal History: A criminal background check will be conducted to verify the candidate's criminal history.
- Employment Verification: Verification of the candidate's employment history will be performed to confirm past positions, job responsibilities and dates of employment. This step may also involve contacting previous employers for references.
- Education Verification: Educational credentials provided by the candidate will be verified to ensure accuracy and legitimacy. This may include contacting educational institutions or using reputable verification services.
- Professional License and Certification Verification: If the position requires specific licenses or certifications, their validity and authenticity will be confirmed through appropriate channels.
- Credit History [if necessary]: In cases where the position involves financial responsibilities, a credit history check may be conducted with the candidate's consent to assess their financial stability.
- Reference Checks: Reference checks will be carried out by contacting the candidate's provided references to gain insights into their professional conduct, skills and qualifications.

In the case of high managerial positions (General Manager) Employment Verification, Education Verification, Verification of Professional Licenses and Certificates, Reference Checking occurs every time. A candidate applying for such a position will be required to provide 2 or 3 contacts with whom verification can be performed. The candidate's personal data will be processed for this purpose on the basis of Article 6(1)(a) of the RODO, i.e. the candidate's consent.

Background checks will be conducted in accordance with all applicable laws, and data processing will be carried out each time on a valid basis for processing.

As a general rule, when applicable law requires a candidate for a position to meet certain prerequisites or conditions necessary for the position, the processing of personal data will be on the basis of Article 6(1)(c) RODO (performance of a legal obligation), and in the case of special category data - on the basis of Article 9(2)(b) or (g) RODO. Special category data and conviction data may be processed, with specific exceptions, only on the basis of Article 6(1)(c) of the RODO.

The processing of personal data on the basis of Article 6(1)(c) of the RODO, and in the case of special category data - on the basis of Article 9(2)(b) or (g) of the RODO, will take place on the basis of specific laws related to the position and Article 22¹ of the Labor Code Act. For other personal data, it is necessary to obtain the employee's consent on the basis of Article 6(1)(a) RODO in connection with Article 22^{1a} of the Labor Code Act. If for a given position it is necessary to process personal data of a special category, information about this should already be included in the offer, along with a preliminary justification of why this data is necessary. The basis for processing such data will then be Article 9(2)(a) of the RODO in conjunction with Article 22^{1b} of the Labor Code Act. The collection of data of a special category of candidates seeking employment based on an employment contract at later stages of recruitment is not allowed.

Any negative results obtained during the background check process will be taken into account in accordance with our company's policies and applicable laws when making final employment decisions.

Confidentiality of the information obtained during the background check process will be maintained and will only be used for employment purposes.

5. Confidentiality

All information related to candidates and the recruitment process will be treated with strict confidentiality in compliance with applicable privacy laws.

6. Offer Letter

1. The Hiring Manager informs the recruitment team of the decision to make an offer to the selected candidate and provides all necessary details regarding the proposed employment terms and conditions.
2. Upon approval, an offer letter will be extended to the selected candidate, outlining the terms and conditions of employment, including compensation, benefits, start date and other relevant details.
3. Candidates will be given reasonable timeframe to accept or decline the offer.

7. Acceptance and Onboarding

1. ACCEPTANCE: After accepting the offer, candidates are expected to promptly inform the recruiter of their acceptance. Upon receipt of this confirmation, the recruiter will confirm the candidate's start date and notify the relevant teams. Teams involved in the recruitment

and onboarding process, such as People Department, Hiring Managers, PMO, Payroll, IT should be informed of the successful hiring and the candidate's start date. This allows for proper planning and coordination of the new hire's integration.

2. ONBOARDING: A person designated by the Chief Operating Officer will be responsible for the implementation process. Their responsibilities will include welcoming the new employee to the organization, helping to complete the necessary documentation and providing training and support.

8. Notification to Unsuccessful Candidates and Position Closure

8.1 Notification to unsuccessful candidates

At Ailleron, we value transparency, professionalism and respect throughout the recruitment process. We recognize that not all candidates selected for consideration will ultimately be offered a position. Thus, the notification to the unsuccessful candidates is essential aspect of our commitment to maintaining positive candidate experiences as well as contributing to our employer brand and reputation and fostering goodwill in the job market.

After careful consideration and the completion of the selection process, candidates who were not selected for the position will be promptly notified. This notification will typically occur via email, or another agreed upon communication method.

The message to unsuccessful candidates will be clear, concise and respectful. It will convey our appreciation for their interest in our organization and the time and effort they invest in the application and interview process.

Candidates who were not selected for the current position may be informed that their profiles will be kept on file for future openings, if they have given their prior consent. The candidate's profile will not include personal data obtained as part of the PREVIEW or personal data provided by the candidate that is not necessary for a future recruitment process. However, this does not apply to assessments made by recruiters as part of prior recruitment.

8.2 Closing a position after hiring a candidate

Once a candidate has been successfully hired and has accepted the job offer, it is essential to conclude the recruitment process. The following steps should be taken: to close the position effectively:

- Unpublish the position: The first step is to immediately remove or unpublish the job posting from all platforms, including our website, job portals and social media channels. This action prevents additional applications and inquiries for the position.
- Update the Talent Pool: If suitable candidates were identified during the recruitment process but were not selected for the current position, they might be considered for future opportunities. This can be done only with the candidate's consent.

9. Feedback and Continuous Improvement

Feedback from both successful and unsuccessful candidates will be solicited and analyzed to continuously improve the recruitment process.

10. Policy Review

This Recruitment Policy will be periodically reviewed and updated to reflect changes in laws, regulations and organizational needs.

11. Implementation

All employees and stakeholders involved in the recruitment process are responsible for adhering this policy.

12. Contact Information

For questions or concerns related to this policy, please contact the People Team or Talent & Benefits Coordinator.