

**Policy against Harassment,
Discrimination and Labor Violence**

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**Policy against Harassment,
Discrimination and Labor Violence**

I. OBJECTIVE

This policy applies to all employees of the Organization and aims to establish the guidelines to identify, analyze, address, and prevent cases of harassment, discrimination, and labor violence, as well as to promote a work environment of respect, freedom, equality and dignity, that seek a favorable organizational culture that contributes to emotional well-being and improving the quality of life of employees and increased productivity.

II. DEFINITIONS

- Workplace - Place or places, present or future, such as buildings, premises, facilities, and areas, where the collaborators of The Organization work.
- Collaborators – Any employee of The Organization, regardless of their position and/or activity.
- Bullying – A form of violence in which, although subordination does not exist, there is an abusive exercise of power that leads to a state of defenselessness and risk for the victim, regardless of whether it is carried out in one or more events.
- Harassment – The exercise of power in a relationship of real subordination of the victim to the aggressor in the workplace, which is expressed in verbal or physical conduct, or both.
- Discrimination – Any action or omission which purpose is to prevent or nullify the recognition or exercise of rights and equal opportunities, including distinctions motivated by ethnic or national origin, gender, age, disabilities, social condition, health conditions, religion, opinions, sexual preferences, marital status or any other that violates human dignity and aims to nullify or undermine the rights and freedoms of people.
- Labor Violence – It is constituted by incidents in which the personnel suffer abuse, threats or attacks in circumstances related to their work, that directly or indirectly endanger their safety, well-being, or health. Typically, they are systematic and persistent

actions or omissions, where an unequal exercise of formal or informal power is at stake and has devastating physical and psychological effects on the offended persons.

III. PRINCIPLES.

In accordance with the values and code of ethics of The Organization, and in line with what is established by the Federal Labor Law and the Federal Regulations on Safety and Health at Work, the following principles must be observed:

- In The Organization there is zero tolerance for any conduct that directly or indirectly implies Bullying, Harassment, Discrimination and Labor Violence.
- All Collaborators have the right to be protected against acts that affect their dignity, such as Bullying, Harassment, Discrimination and Labor Violence. This principle empowers the adoption of protection measures for affected Employees and is closely linked to the principle of confidentiality.
- All Collaborators have the right to carry out their activities in a healthy and safe environment that preserves their physical and mental health and that stimulates their professional development and performance. Acts of Bullying, Harassment, Discrimination and Labor Violence are contrary to this principle.
- All Collaborators must be treated with respect in their work environment, with equitable access to productive resources and employment. Any type of discrimination and violence is contrary to this principle.
- All procedures carried out in accordance with this Policy will be confidential (see Point VII Reporting Procedure)

IV. PROHIBITIONS.

By way of example but not limited to, the following behaviors are prohibited and those who commit them will be subject to disciplinary measures determined by The Organization, which may range from a call for attention or verbal warning, relocation of the position, change of schedule, suspension of employment and even the justified termination of the employment relationship, regardless of any possible investigation and its consequences by the competent authorities:

- a) Any act that implies or represents Bullying or Harassment, according to the terms defined above. This includes, as described below, intimidating, overshadowing,

frightening or emotionally or intellectually consuming any person, with a view to excluding them from The Organization or to satisfy the need to attack, control and destroy by the harasser; any offensive flirting, unwelcome sexual advances or propositions; offensive or degrading words of a sexual nature; display of sexually suggestive and/or offensive objects or images in the workplace, as well as any unwanted lewd physical contact.

- b) Unwanted physical behavior of a sexual nature: unwanted physical contact ranging from unnecessary touching, patting, pinching or rubbing the body by a person who is part of or linked to the same work environment.
- c) Verbal conduct of a sexual nature: annoying sexual advances, propositions or pressure for sexual activity, insistence to have encounters inside or outside the workplace, suggestive or obscene comments, after it has been stated that such conduct is annoying.
- d) Non-verbal behavior of a sexual nature: exhibition of sexually suggestive or pornographic photos, of objects or written materials, immodest looks or with an exaggerated inclination to sexual desire, whistles or gestures that generate thoughts of sexual connotation and that are uncomfortable or threatening for other people, affecting their employment situation.
- e) Behaviors based on sex that affect the dignity of the person in the workplace: conduct of a sexual nature that denigrates or is intimidating or physically abusive. For example, insults that are related to sex and comments of a sexual nature, about appearance or clothing that are offensive.
- f) Any act that implies or represents Labor Violence, according to the term defined above. This includes limiting the possibilities of communication between Collaborators through oppressive actions; attacks on personal social relationships (humiliating behavior, limiting the possibilities of maintaining social contacts, denial of rights), attacks on reputation (isolating behavior, spreading rumors, ridicule, disparagement of the victim's work); attacks on professional quality and vital situation (frequent changes in tasks, trying to reduce the performance of the person in their profession and in life in general), as well as attacks on professional quality and vital situation (frequent changes in tasks, seeking to reduce the performance of the person in his profession and in life in general).
- g) Any act that implies or represents Discrimination, according to the term defined above. This includes any type of public or private comment or manifestation that is denigrating based on stereotypes and gender roles or a disability condition.

V. CONFIDENTIALITY

Every process of complaint and investigation will be completely confidential. The Organization is committed to maintaining the confidentiality during the processes as determined by the applicable laws.

VI. NO RETALIATION OR DEFAMATION

The Organization has the compromise of creating and preserving an environment where the Collaborators feel free to inform in a good faith basis of any transgression of The Organization's policies and/or any crime. The complaints related to the transgression of this policy will be taken seriously and will be investigated promptly.

The retaliations and defamations will not be tolerated and will have as a consequence the disciplinary measures determined by The Organization, which can go from a call for attention or verbal warning, relocation of the position, change of schedule, suspension of employment and even the justified termination of the employment relationship, regardless of any possible investigation and its consequences by the competent authorities.

The Organization condemns any kind of false accusation aimed at discrediting and challenging the integrity of the Collaborators.

VII. REPORTING PROCEDURE

The Organization requires that all cases of Bullying, Harassment, Discrimination or Labor Violence be reported promptly, in a way that the correct and necessary actions can be taken promptly to avoid the deterioration of interpersonal relationships in the workplace. All the Collaborators have the obligation to report promptly any act of which they have knowledge that goes against this policy.

1. The filing of the complaint, verbal or written, must be directed to the Comptroller Direction. If the complaint is against the Comptroller Direction, it shall be interposed before the General Direction, and if it is against the latter, it shall be directed to the Administration and Finance Director.
2. Once the complaint has been received, it will be communicated to the person responsible for the discriminatory conduct, who must present their testimony and evidence, guaranteeing their right to be heard and their evidence considered.

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3. All documents and evidence must be made known to both parties by the person in charge of processing the complaint.
 4. The parties may present the evidence they deem pertinent, even before the resolution is issued, which will be final and unappealable.
 5. The investigation process must be concluded, if possible, within a period of no more than 30 calendar days.
 6. Once the investigation stage has concluded, the parties will be informed of the final decision.

To evaluate the existence or configuration of the complaint, The Organization may use the criterion of reasonableness or discretion, analyzing each specific case and the parties involved, such as their qualities, background, work history, specific circumstances and the existence of hostile, humiliating, offensive or unwarranted conducts.

On the other hand, in order to determine the seriousness of the conduct and the sanction, the level of affectation towards the victim, the intentionality, any advantageous position and the recidivism of the aforementioned manifestations must be taken into account.

If the complaint is declared well founded, the Collaborator may be channeled to receive psychological attention and information about the rights they have to file a complaint against the aggressor before the competent authorities.

Update date: November, 2020

This document will be reviewed and updated when:

- Any changes are made to the process described.
- Amendments to labor legislation are established.
- On the recommendation of external advice.