

## **PROTOCOL FOR THE PREVENTION OF SEXUAL, MORAL AND OTHER FORMS OF VIOLENCE OR DISCRIMINATION**

### **1. Introduction**

The purpose of this Protocol is to establish parameters of action to ensure the fundamental right of every person to be treated with respect and dignity. No practice involving sexual harassment, moral harassment or any other type of violence or discrimination is allowed at the workplace.

The aim is to raise awareness and train all staff that perform duties in Ontur International S.A. (hereinafter, the “Company” (own staff or of outsourced companies)), regardless of their position or hierarchy, to prevent them, identify them, sanction them in the event of their occurrence and eradicate them through the mechanisms provided for in hereinunder.

### **2. Prohibited Behaviors**

#### **Sexual Harassment**

The Company expressly prohibits and rejects any type of sexual harassment, in accordance with the provisions of Law 18,561 and Decree No. 256/017, following the regulations in force such as:

- a behavior of a sexual nature, carried out by a person of the same or different sex;
- unwanted by the person to which such behavior is addressed;
- within a hierarchy relationship, as well as between employees at the same hierarchical level;
- and whose rejection results in or threatens to harm their work situation; or creates an intimidating, hostile, or humiliating work environment for the recipient.

Sexual harassment may manifest itself, *inter alia*, in requests for sexual favors accompanied by a promise of preferential treatment or a threat of harm to the current or future employment situation; body approaches or other physical behaviors of a sexual nature that are unwanted and offensive to the recipient; use of expressions or images

of a sexual nature that are humiliating or offensive to the recipient.

### **Moral harassment**

Furthermore, any form of moral harassment, understood as any systematic conduct in the workplace, which directly or indirectly impairs the employee's dignity, to whom an emotional and psychological harm is produced in a violent or hostile manner, shall be unacceptable.

As an example, conducts that may constitute harassment may include those that seek to nullify an employee's ability, career advancement, or tenure; exclude or isolate the employee; evaluate an employee's work unevenly; unjustified punishments; verbal offenses, insults or screaming.

Finally, any form of physical or moral violence, abusive, hostile, offensive conduct or any type of discrimination based on race, color, sex, sexual preference, religion, or political opinion, national ancestry or social origin. All of the Company's staff, regardless of their hierarchy, must refrain from carrying out this type of misconduct.

### **3. Prevention and training**

For the purpose of preventing, discouraging and avoiding the prohibited conduct detailed in the preceding article, the Company shall promote awareness campaigns and billboards, compulsory attendance workshops or training courses shall be carried out, and this Protocol shall be disclosed and notified to all employees.

In the case of outsourced companies, Ontur shall require the submission of protocols, according to the law, in order to work in its facilities. In case of not having this documentation, the outsourced company shall be given a term of 45 days to resolve this aspect.

### **4. Complaints mechanisms**

If you are a victim or witness any situation of harassment, abuse, violence, or discrimination, you must report it personally [to the "Complaints Committee"] of the Company, who shall have the competence to ensure compliance

of this Protocol. The “Complaints Committee” is formed by the Head of Management, the General Manager and the President of the Board of Directors.

The complaint must be submitted in writing in a closed envelope and/or by sending an e-mail to the e-mail address “denuncias@ontur.com.uy” and must have the following content: submission date, identification of the complainant, identification of the victim in case it differs from the former, identification of the perpetrator, succinct account of the facts and behaviors that would form a prohibited and inappropriate behavior, detail of all documentary or witnesses evidence to be asserted, and the signature of the complainant.

In the event that the complaint is made orally, the complainant must be accompanied by another employee who attest such fact, and minutes containing all the above described data must be drawn up immediately, which must be signed by the complainant.

A confidential record shall be kept of any and all complaints made, as well as of the measures taken and the decisions made by the competent staff.

## **5. Investigation**

The Complaints Committee shall have the broadest powers to obtain the truth of the facts alleged and shall conduct an investigation as fast as the case may require to be recorded in writing.

Absolute reserve of the investigation shall be maintained, guaranteeing both the complainant and the denounced party the protection of their privacy, the right to be heard, to propose evidence and to defend their positions.

Among other duties, it may: collect the individual and confidential statement of the victim, the denounced party and witnesses proposed or understood to be relevant, analyze the evidence provided by both parties, request documentary evidence or additional information, visit all of the Company's work areas to determine any elements relevant to the specific case.

The term for the investigation and elaboration of a draft resolution shall be no more than twenty calendar days from the date of the actual notification of the complaint, with possibility of extension for a period of ten additional calendar days depending on the circumstances of the case.

During the entire process, both the denounced party and the complainant may rely on legal assistance, which must be supported and/or provided by the same.

## **6. Protection and/or prevention precautionary measures**

The Complaints Committee with legal advice may evaluate the suitability and implement, when the case so warrants, protection and/or prevention precautionary measures that seek to preserve the privacy and psycho-physical integrity of the alleged victim, within 72 hours of the notification of the complaint.

The precautionary measures shall extend until the completion of the investigation, and may then be retained as final in the final resolution to be issued by the Complaints Committee, if considered appropriate.

Protection and/or prevention precautionary measures can be adopted both with regards to the complainant or denounced party and/or any witnesses, do not have punitive nature, but shall always seek to mitigate the damages to those involved and must be adopted after consultation with them. In any case, its adoption shall be justified within the framework of the protection and support of the victim and witnesses during the processing of the complaint, and shall not entitle to claim indirect dismissal.

Temporary measures may include: change of shift or working hours to avoid contact between those involved or to allow the attendance to psychological or psychiatric appointments, not staying in the shift alone, change of sector or area of activity, extraordinary leave or provisional suspension without affecting salaries, transfer if possible.

## **7. Final Resolution**

After all the instances of investigation aimed at elucidating the situation of harassment, violence or discrimination, the Complaints Committee shall draw up a draft resolution, which shall contain its conclusions and, if necessary, the disciplinary and/or organizational measures to be enforced, seeking the most immediate reversal of any misconduct and minimizing the consequences that it may generate.

When the investigation finds that the complainant misrepresented the complaint or should any conduct prohibited by this Protocol on the part of the denounced party be verified, this may be grounds for dismissal for severe misconduct, depending on the seriousness of the case.

The draft resolution shall be notified in a reliable manner, both to the denounced party and to the complainant, who shall have a period of three calendar days from the notification, to file their answer in written form to the Complaints Committee. Upon failure to do so within such term, the resolution shall be deemed to be final.

In the case of filing an answer, the Complaints Committee shall have a period of up to five consecutive days to issue a final resolution, which shall be notified in a reliable manner to those involved.

If the complainant or the denounced party considers that the final resolution is detrimental to their fundamental rights, whether for reasons of legality or merit, they shall have a term of 10 business days to appear before the General Labor and Social Security Inspection, to request that an investigation be initiated within such scope.

## **8. Evaluation and monitoring**

The Complaints Committee shall monitor the situation denounced and the parties involved, for the purposes of verifying that the conduct prohibited under this Protocol has terminated. To do so, they shall request reports to the immediate superior of both employees as well as an evaluation of a work relationship consistent with the dignity and respect of every person.

## **9. Prohibition of retaliation**

The complainant, as well as those who have testified as witnesses, may not be subject to dismissal or disciplinary sanctions, unless that once the investigation has been completed, it is proven that they have acted deceitfully seeking a benefit to themselves or an unfair impairment to another person.

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I hereby consider myself formally notified of the above Protocol, which deserves my agreement in each and every part of it. I hereby further undertake to comply with each of the items set forth herein, being informed that failure to comply with any aspect is grounds for disciplinary sanctions.

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Date: \_\_\_\_\_

Identity document: \_\_\_\_\_