

Framework

This document establishes Idepa's internal regulations to guarantee the guidelines of the ILO, the United Nations Universal Declaration of Human Rights, the United Nations Conventions on the rights of the child and the elimination of all forms of discrimination. This guarantees:

1. Rights to freedom of association and collective bargaining
2. Ethical behaviour of the company and employees
3. Fair pay
4. Prohibition of any form of discrimination
5. Prohibition of abuse and harassment of any nature
6. Safety and health at work
7. Decent working hours
8. Special protection for young workers
9. Prohibition of child labour
10. Give up precarious work

1. Freedom of association and collective bargaining

All Idepa employees are free to form and/or join trade union associations or other types of groups whose objective is to promote and protect workers' rights, as provided for in legislation. Employees who are part of any of these groups will not be the target of persecution, nor will they suffer any type of retaliation from the company.

When the rights to freedom of association and collective bargaining are restricted by law, appropriate channels must be defined to ensure a reasonable and independent exercise of these rights ^(*1).

(*1: Aspects related to freedom of association and collective bargaining practices are governed by ILO Conventions 87, 98 and 135.

2. Ethical behaviour of the company and employees

Idepa is committed to promoting a work environment based on mutual respect among all employees regardless of their hierarchical position within the Organization.

All employees are expected to practice good conduct during the performance of their duties. This conduct, in addition to its labour obligations, includes an interpersonal relationship based on mutual respect for the company and all its employees, regardless of their hierarchical position.

The conduct of employees must be guided by the basic values of impartiality, transparency, rigor and responsibility, mutual respect and cooperation. Employees must, in their professional roles and as co-workers, act with high standards of ethics, sensitivity and responsibility in order to be facilitators of mutual assistance and avoid conflicts.

The organization will act in everything with the ultimate objective of defending respect and dignity of human life, civilizing values and the rule of law.

Conduct required of employees:

- Respect, be courteous and polite with all Idepa employees and external organizations that interact with it;

IDEPA SOCIAL POLICY

- Help with the integration of new colleagues or colleagues starting new roles;
- Have a cooperative and facilitating attitude towards colleagues and superiors;
- Follow the professional guidelines and instructions of your superiors;
- Actively participate in work improvements;
- Do not practice any type of discrimination or harassment towards colleagues and superiors.

As an employer, Idepa is committed to:

- Respect your workers;
- Provide physical and moral working conditions;
- Do not engage in acts of harassment or discrimination;
- Guarantee equal opportunities and treatment for all employees, regardless of their nationality, origin, colour, sex, religion, political opinion, descent or social origin, sexual orientation and age.
- All people who maintain, directly or indirectly, an employment, economic, social or industrial relationship with the company, receive cordial, fair, respectful and dignified treatment.
- All of its activities are carried out in strict compliance with the protection of the hygiene and safety of employees and the environment.

3. Fair pay

The company respects the right of workers to receive fair remuneration, in accordance with legal provisions. Written and perceptible information about your salary conditions is guaranteed at the time of hiring and detailed information about any particularity of the salary whenever it is paid.

The company undertakes not to make any type of deduction and/or withholding from salaries for disciplinary reasons or for any other reason other than those established in applicable legislation, without authorization from its employees.

4. Prohibition of any form of discrimination

4.1 Definition:

Discrimination ^{(*)2} is the act of treating someone unequally or unfairly based on prejudices or personal or individual characteristics, such as:

- Race, colour, ethnicity or nationality;
- Gender or gender identity;
- Sexual orientation;
- Age;
- Religion;
- Disability;
- Maternity;
- Former military personnel;
- Any other legally protected status.

4.2 Regulation:

Any type of discrimination is not tolerated either in access to employment or in the performance of functions, whether within the organization or in contact with organizations that interact with the company.

No discriminatory behaviours is perpetrated or permitted in relation to work practices, in the exercise of functions, in the exercise of management positions, in the exercise of communication, evaluation, remuneration, incentives, awards, access to training and hiring or dismissal.

(*2: Based on ILO Convention 111.

5. Prohibition of abuse and harassment of any nature

5.1 Definitions:

Harassment constitutes a form of verbal, visual or physical offense or abuse, or other conduct of any kind that creates an uncomfortable, intimidating, offensive or even hostile situation. The following non-exhaustive list is considered to be unacceptable behaviour:

- Sexual harassment;
- Moral harassment;
- Offensive language or jokes;
- Racial, ethnic, gender or religious insults;
- Degrading comments;
- Intimidating or embarrassing behaviour;
- Threatening behaviour;
- Showing hostility towards others due to individual characteristics.

Sexual harassment:

Sexual harassment can consist of verbal, visual or physical conduct of a sexual nature that is unwelcome or that makes someone feel uncomfortable and/or offended. It can take several forms, such as:

- Sexual advances, requests for sexual favours or requests to go out that are not welcome;
- Sexually oriented jokes, images, written messages or emails;
- Explicit or derogatory comments about appearance;
- Presentation of sexually suggestive or pornographic images.

Moral harassment:

Moral harassment is unwanted behaviours, practiced with some degree of repetition, with the objective or effect of affecting the person's dignity and/or creating an intimidating, hostile, degrading, humiliating or destabilizing environment. It may consist of verbal attacks with offensive or humiliating content, physical acts, or more subtle acts, which may include physical and/or psychological violence, aimed at lowering the person's self-esteem.

The following acts are considered moral harassment, among others:

- Promote social isolation from co-workers or subordinates;
- Ridicule, directly or indirectly, a physical or psychological characteristic of co-workers or subordinates;
- Make recurring threats;
- Disdain, ignore or humiliate colleagues or workers, forcing their isolation from other colleagues or superiors;
- Systematically disseminate rumours and/or malicious comments or repeated criticisms about co-workers, subordinates or superiors;
- Systematically commenting on someone else's personal life or systematically insinuating that that person has mental or family problems;
- Make frequent jokes with offensive content.

5.2 Regulation:

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No harassment or any other form of offensive or disrespectful conduct is tolerated.

No uncomfortable attitudes or attitudes that make co-workers feel uncomfortable in their work environment are permitted. It is important to remember that harassment, sexual or otherwise, is determined by the individual's actions and how they impact others, regardless of their intentions.

Employees are asked to report on behalf of themselves or other co-workers any and all instances of abuse or harassment.

In accordance with applicable law, whenever any situation of harassment occurs at work, a disciplinary procedure will be opened, which may culminate in the application of a disciplinary sanction to the offender, when the procedure results in a demonstrated violation of this regulation.

Supervisors, by force and depending on their duties, may also be subject to this disciplinary action for failing to adequately control or report misconduct by any employee.

Some of the violations of this Regulation may also be violations of the Law, which may lead to individual criminal proceedings and, if convicted, to fines and imprisonment.

How to report?

To report illegal or unethical behaviour, you may contact one of the following people:

- Hierarchical superior or direct manager;
- Human resources department;
- Complaints page.

Non-retaliation commitment

No retaliation is tolerated against a good-faith whistleblower. Reporting any situation of violation of this regulation will be supported by senior management, in order to clarify and investigate the facts, with the guarantee of protection for the complainant against any retaliation.

All reports will be investigated and addressed as appropriate.

6. Safety and health at work

Idepa guarantees its employees a safe and healthy working environment, complying with the legal and regulatory precepts applicable in this matter.

Idepa is committed to providing personal protective equipment to all its workers, according to their sector of activity, in order to protect them from possible risks and accidents, preserving their health and well-being.

Good hygiene and safety practices are promoted to prevent accidents and risks to workers' health.

A documented risk assessment is maintained, with the necessary adoption of the necessary measures to eliminate or reduce them.

Minimum conditions of lighting, ventilation, hygiene, personal protection, fire prevention, safety measures and access to drinking water are ensured.

Access to and use of canteens and hygienic restrooms, with drinking water and means of preserving food, are guaranteed.

Regular training in occupational health, hygiene and safety is ensured, with appropriate records maintained of all training activities carried out.

7. Decent working hours

Idepa is committed to complying with the stipulations of the CLT and laws applicable to its work sectors, such as weekly working hours, salary scales and overtime, shift operation, rest time and vacations.

8. Special protection for young workers

Special protection is guaranteed to workers who have not yet reached adulthood.

Adequate and sufficient monitoring is guaranteed to young people, whether on internship or not, in order to facilitate their integration and ensure the learning necessary for the correct performance of their role, in full compliance with hygiene and safety rules.

9. Prohibition of child labour

The use of child labour is not permitted. The minimum age for admission is 17 years old with mandatory minimum education completed.

Workers aged between 17 and 18 are considered apprentice workers. They must not work in shifts or in dangerous conditions ^(*3).

(*3: Regulated by ILO conventions 138 and 182.

10. Give up precarious work

Idepa is committed to ensuring that all forms of contracting are in compliance with current labour legislation, without prejudice to the recognized rights of workers in labour and social security legislation, through schemes in which there is no real intention to promote regular employment, in the scope of regulation of employment relations.