



ALEATICA

RHS-POLI-01

DIVERSITY, EQUITY AND INCLUSION POLICY

Policy Owner:

People and Culture
Department

Reviewed by:

ALEATICA CEO

Approved by:

Date: July 17th 2024
ALEATICA Board of Directors

Scope:

Applicable to all companies over which ALEATICA SAU or ALEATICA SAB have control. For those investees in which ALEATICA has appointed a member of the Governance Body, such members shall propose the adoption of measures similar to those expressed herein and shall inform the owner of this document whether the investee has adopted measures similar to those established herein or has decided to adopt this Norm / Policy.

**Document
classification**

Public

Control of changes

Revision	Section	Brief description of the change

Related and applicable documentation

	Code of Ethics
DCR-POLI-02	Anti-corruption Policy
DSA-POLI-09	Human Rights Policy
RHS-POLI-01	Safety and Security Policy
DPM-POLI-01	Regulatory and Quality Control Policy
RHS-NORM-03	Internal Talent Development and Mobility Norm
	United Nations Global Compact

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1. DIVERSITY, EQUITY AND INCLUSION (DEI) POLICY

At ALEATICA, we foster a culture of belonging through respect, openness and flexibility, where we decisively value individuality and authenticity, and embrace diversity, equity and inclusion, with the goal of promoting an environment where everyone feels comfortable and valued.

2. OBJECTIVE

Define and establish action guidelines where all employees feel valued, respected and have equal opportunity to grow and contribute to their maximum potential, which in turn may lead to better performance, innovation and job satisfaction.

3. DEFINITIONS

Accessibility: General principle and right to the adoption of appropriate measures to ensure that all parts of the working environment, such as buildings, sites,, facilities and areas, with or without furniture, machinery or equipment, allow employees with disabilities to enter, move around, exit, orient themselves and communicate safely, autonomously and comfortably so they can perform activities related to production, sales, transport and storage or provision of services.

Affirmative Action: Is a special, specific and temporary measure put in place in favor of people or groups of people who are in a situation subject to discrimination. The objective of these measures is to correct known situations of inequity in the enjoyment or exercise of rights and freedoms. It is applicable for as long as such situations continue to exist. It shall be adapted to the situation that we are seeking to correct and shall not be discriminatory, and it also must be legal and respect the principles of justice and proportionality.

Authenticity: Refers to being genuine and true to oneself. Implies acting and expressing oneself in accordance with personal values, beliefs and emotions, rather than trying to be what others expect and want us to be. Being authentic implies being honest and transparent in our actions and communications, and not trying to hide or disguise who we really are.

Belonging: Sense of identification and connection that employees feel towards their organization. It is the feeling of being part of something bigger and having a common goal with the Company where they work. When employees feel like they are part of the organisation, they are more committed, motivated and willing to contribute positively. Belonging can also affect talent retention, since employees who feel like they are part of the Company tend to stay for longer and have a higher level of job satisfaction.

Culture: Set of values, beliefs, norms and behaviors shared by the members of an organisation. It is the way that an organisation defines its identity and establishes the written and unwritten rules that guide the behavior of its employees. Organisational culture influences how decisions are made, how employees communicate, how conflict is managed and how relationships are established within the organisation.

Disability: Is the result of the interaction of physical, mental or sensory conditions with barriers that hinder the full participation of people with such condition. It encompasses a wide range of situations that may or may not be noticeable, differ in duration and development.

Discrimination: Any discrimination, exclusion or preference based on reasons which may include, among others, race, sexual preference, colour, disability, gender, religion, political opinion, age, nationality or social origin, by action or omission, with intent or without, with the effect of impeding or cancelling the recognition or exercise of the rights and actual equal opportunities for a certain group. Dominant perspective where a group of people is superior

to another for any reason.

Diversity: Variety of characteristics, perspectives, experiences and abilities that exist among people. These characteristics may include, among others, race, ethnic origin, gender, sexual orientation, age, religion, disability, nationality or socio-economic level. Diversity recognises and values individual differences and promotes the inclusion of all people in society. It is about recognising that each person is unique and has something unique to contribute. Diversity enriches our communities and organisations by fostering creativity, innovation and conflict resolution from different perspectives.

Equity: Refers to justice and impartiality in the distribution of resources, opportunities and benefits in a society. It is about guaranteeing that everyone has equal access to the resources and opportunities they need to achieve their maximum potential. Equity seeks to eliminate inequity and barriers that may exist due to factors like gender, race, social class or disability. Rather than treating everyone in the same way, equity recognises that some people may need more support or additional resources in order to have the same opportunities as others.

Flexibility: Refers to the ability to adapt and respond quickly and efficiently to changes, challenges and demands in the business environment. It is the ability to adjust and modify the strategies, processes, policies and practices of the organisation to remain relevant and competitive. Flexibility implies being willing to abandon obsolete approaches and practices, and being open to new ideas, technologies and ways of working. It is about being receptive to changes in the market, user needs, industry trends and demands by employees.

Gender: Socially constructed characteristics, roles, behaviors and expectations attributed to people based on their biological sex. It is a social and cultural construct that varies in different societies and over time. Gender includes aspects like gender identity (the way a person identifies and feels in terms of their gender, which may be masculine, feminine, both or neither), gender expression (the way a person exhibits their gender through their appearance, behavior and dress) and gender roles (social expectations and norms associated with each gender). It is important to stress that gender is not limited to the binary categories of masculine and feminine, and that there are diverse gender identities and expressions that go beyond this dichotomy.

Inclusion: Action of creating an environment where all people are valued, respected and have equal opportunity to fully participate in society. It is about guaranteeing that everyone, regardless of their ethnic origin, gender, sexual orientation, disability, age or any other characteristic, is accepted and can make significant contributions in all aspects of life, whether in the work, education, social or community environment. Inclusion implies removing barriers and prejudices that may exclude certain groups of people and limit their participation.

Individuality: A person's unique and distinctive characteristics. It is what makes each individual different from others in terms of personality, abilities, interests, values and experiences. Individuality is developed over a person's life and is influenced by a combination of genetic and environmental factors.

Openness: Willingness and ability of the Company to be transparent, receptive and flexible in its communication and decision-making. It is the attitude of being willing to listen to different perspectives, ideas and opinions, and to be open to feedback and change. An open organisation fosters an environment that values and promotes open and honest communication. It encourages employees to express their ideas, concerns and recommendations without fear of retaliation. It involves establishing effective channels of communication and fostering involvement by all members of the team.

Psychological Safety: Refers to an environment where people feel safe to express their ideas, opinions and concerns without fear of retaliation or judgement. It is a concept that is applied both in the work environment and in other social contexts. When there is psychological

safety, people feel free to be authentic, to make mistakes and to assume risks without fear of punishment or humiliation. This fosters confidence, collaboration and creativity, making it possible for people to develop fully and reach their maximum potential.

Respect: Refers to fair, considerate and dignified treatment of everyone who forms part of the Company, whether it be employees, users, suppliers or any other interested party. It is a fundamental value that promotes a positive, inclusive and collaborative work environment. Respect implies recognising and valuing the diversity of opinions, experiences and skills of each individual, as well as their rights and dignity. It consists of treating others with courtesy, actively listening, being empathetic and considering the needs and perspectives of others.

Sex: Biological and physiological characteristics that differentiate human beings in terms of their sexual reproduction. These characteristics include sexual reproduction organs, chromosomes and sexual hormones. Generally speaking, people are classified into two sex categories: masculine and feminine. People assigned as masculine generally have masculine sexual organs, XY sexual chromosomes and higher levels of masculine sexual hormones like testosterone. On the other hand, people assigned as feminine generally have female sexual organs, XX sexual chromosomes and higher levels of female sexual hormones like estrogen. However, it is important to keep in mind that it is not always that easy to determine sex and there may be intersex variations where the sexual characteristics do not strictly align with the binary masculine and feminine categories.

Sexual Harassment: In the work environment, sexual harassment is considered to be all conduct consisting of words, gestures, concrete attitudes or actions, carried out in connection with or as a result of a labor relationship, and directed at a person with the intent of obtaining a response of a sexual nature, and that is not freely accepted by the recipient, regardless of whether it occurs through one or several events. It is any verbal, psychological or physical behavior directed at a person who does not wish to receive it and related to sex, for the purpose of damaging the dignity of such person or creating an intimidating, hostile, humiliating or offensive environment.

Workplace Harassment: Any conduct, practice or behavior performed on a systemic or recurring basis within the context of a work relationship and that directly or indirectly implies a detriment or impairment to the dignity of a person, in an attempt to cause them emotional and psychological subjection in a violent or hostile way, and with the goal of undermining their capacity, professional promotion or retention in their work position, negatively affecting the work environment.

4. CONTEXT

ALEATICA is committed to promoting an inclusive, fair and diverse work environment. We recognize that diversity in all of its aspects, including but not limited to race, ethnicity, gender, sexual orientation, age, religion, disability and socio-economic background, enriches our culture, strengthens our team and fosters innovation. We firmly believe that all individuals deserve equal opportunities and respect.

Our Company also advocates for a culture of inclusion and acceptance. We encourage inclusion by creating a work environment where each person can achieve their goals and develop. We promote an environment of understanding and acceptance where everyone can develop their talent each day. We are committed to creating work environments where all employees are responsible for treating their colleagues, candidates, suppliers, contractors and users with respect. We maintain a policy of zero tolerance for any type of discrimination.

ALEATICA recognises the importance of creating an environment and culture that

encourages a sense of belonging, as a result of acting in alignment and congruently with all employees, considering the following equation as the foundation of our strategy:



5. ALEATICA PRINCIPLES OF DIVERSITY, EQUITY AND INCLUSION

The principles that govern ALEATICA are:

- Create a culture of respect:** We foster an inclusive work environment, where all employees feel valued, respected and safe to express their opinions and be themselves.
- Promote equal opportunity:** We base our employment, promotion, compensation and professional development decisions on merit and skill, with no discrimination, applying affirmative action when there is justification for doing so. We make sure that our hiring processes are impartial and are designed to attract and retain diverse talent.
- Value diversity:** We recognise diversity as an asset and make an effort to create teams and work environments that reflect the variety of perspectives and experiences of our employees. We foster collaboration and the exchange of ideas between people from different backgrounds and cultures.
- Guarantee Psychological Safety and Non-discrimination:** We are committed to creating an environment that promotes having everyone feel safe, without fear of retaliation, judgment or discrimination.

6. GENERAL GUIDELINES FOR CONDUCT AND ACTION

ALEATICA and its employee assume the following commitments and guidelines for action to foster the consolidation of a diverse, fair and inclusive culture:

- At ALEATICA we respect and value individual differences of all kinds.
- We promote development and training programs for all employees, favoring equal access and fair distribution of professional development resources.
- We support growth and promotion of talented and diverse individuals within our organisation.
- We foster responsibility and transparency through measures to guarantee that all

Policies, practices and decisions are aligned with our principles of diversity, equity and inclusion.

5. We have a structure of Committees that are responsible for designing and executing strategies, initiatives and actions that promote and increase the construction of a diverse, fair and inclusive culture.
6. We regularly review our progress based on measurable goals and we are transparent in our communication.
7. We have zero tolerance for any type of harassment, discrimination or prejudicial behavior, and we thus take firm action to eradicate these behaviors.
8. We have confidential communication channels and a fair investigation processes to address and resolve any issues related to diversity, equity and inclusion.
9. We look to grant equal employment opportunities to diverse candidates through inclusive recruitment and selection processes.
10. We foster an environment and culture of respect and encourage open and transparent communication that is free from discrimination, harassment and any other form of intolerance or violence.
11. Our talent selection, evaluation and development processes are based on performance parameters and potential without distinctions based on gender, preference, ideology, age, origin, race or ethnicity, culture, marital status, nationality or any other kind.
12. We respect and promote balance between the personal, professional and work environment for the people who work at the company.
13. We promote the formation of diverse work teams and the fair assignment of responsibilities and workloads, as well as understanding and adoption of diversity, equity and inclusion as part of our organisational culture.
14. We are committed to reporting, penalising and avoiding any type of conduct that implies a lack of equity or inclusion and/or that implies actions that are discriminatory, isolating, mocking, alienating or other similar actions.

7. FOLLOWING THIS POLICY AND REPORTING AND COMPLAINTS STRUCTURE

The people who work at ALEATICA make a commitment to comply with the corporate values that identify us and that are contained in the Code of Ethics, internal Policies and Norms and the guidelines derived therefrom, in order to ensure that we achieve our purpose: to build a positive work environment for the personal and professional development of each of our employees.

As such, any violation of our Code of Ethics, and internal Policies or Norms, including this Policy, may result in the application of disciplinary measures, from a verbal warning, to application of a written warning to be included in the employee file, work suspension, economic penalty, or, when applicable and with respect to labor rights and due process, termination of the labor relationship with the Company, based on the provisions of the Company's Internal Work Regulations and the Labour Laws in effect in each country.

In order for employees to express their adherence to the Policy, they will be invited to sign Appendix 1. DEI Commitment letter. It is necessary for employees to be aware of our responsibility in creating a diverse and inclusive work environment. Signing the Letter of Commitment implies our assumption of the duty to comply with the principles and guidelines set forth in the Policy.

For all actions not covered by this Policy, or in the Code of Ethics, we shall apply the measures determined to be advisable at the time, considering the values of the Group and

the current applicable legislation.

ALEATICA has a Compliance Department, which reports directly to the ALEATICA Board of Directors through the Audit Committee, as well as a confidential communication channel (ICARE) to guarantee compliance with this Policy and to receive and address comments, questions or complaints made in good faith, with respect to the interpretation, application or compliance with such, offering the ability to make these reports anonymously.

Any questions related to this Diversity, Equity and Inclusion Policy can be directed to the People and Culture department teams of each Business Unit and Corporate.

8. OUR COMMITMENT TO CONFIDENTIALITY

ALEATICA is committed to the confidential management of the personal data of all its employees and officers, protecting the information related to their individual characteristics in order to avoid potential discriminatory actions.

ALEATICA shall respect the legal provisions applicable to personal data protection, in all cases allowing for the correction or change thereof, in strict compliance with the principle of consent.

9. DIVERSITY, EQUITY AND INCLUSION COMMITTEE

In order to guarantee complete alignment with the company's governance structure and decision-making, both with respect to the strategy and this Diversity, Equity and Inclusion Policy, we will create the diversity, equity and inclusion committee to propose indicators that are aligned with ALEATICA's shared objectives and will have the following key elements:



- **Talent Management Policies and Strategy:** Our DEI strategy clearly and closely feeds and determines the way we manage talent in the company. Our Human Resources

management policies relate to the DEI strategy, promoting consistent management of people in compliance with our DEI aspiration and focus.

- **Business Strategy:** Diversity, equity and inclusion principles and efforts are always aligned with the business and operating strategy, strengthening our objectives and making it possible to achieve the goals we have established.
- **Sustainability Strategy (ESG):** Our DEI strategy is part of the corporate ESG actions, strengthening the social aspect and creating value for our employees, as well as for the communities where we operate and the users we serve.
- **Code of Ethics / Compliance:** The DEI actions, strategies and initiatives at ALEATICA are aligned and superseded by the provisions established in our Code of Ethics, as well as the guidelines of our organisational compliance structure.

10. EXECUTION PRINCIPLES

Based on our aspiration, at ALEATICA we foster diversity, equity and inclusion as a fundamental part of our culture. However, in order to have focus and be effective in the consolidation of these aspects, we have established 3 initial focus points for execution of initiatives that respond to the most imperative needs of the company during the first three years of work related to DEI:

- **Gender:** Gender approach focused on achieving higher levels of equity and participation of the female gender in our functions, operations and leadership roles.
- **Multiculturalism:** Focus on the consolidation of One ALEATICA where all of the geographies and origins converge in a culture that sets us apart and where we all feel that we are a part.
- **Disabilities:** Promote integration and participation of people with disabilities in our functions, operations, roles and responsibilities.

In terms of governance, the following responsibilities are established:

1. **People and Culture Area:** Primarily responsible for execution of the DEI strategy.
2. **Board of Directors:** Maximum controlling body that makes high-level decisions with respect to the DEI strategy through the People and Culture Committee.

However, the concerns of other collectives can be addressed through direct participation by our employees in interest and action groups that may come to be formed:

- **BRG (Business Resource Group)** - BRGs represent groups of employees with different diversities based on the reality in the Company.
- **ERG (Employee Resource Group)** - Employee resource groups are voluntary groups made up of employees with the objective of fostering a diverse and inclusive workplace based on common interests.

11. APPENDIXES

Appendix 1. DEI Commitment letter

Appendix 1. DEI Commitment

[Date]

Dear Colleague,

We are pleased to share with you our Diversity, Equity and Inclusion Policy, which reflects our commitment to creating an environment where individual differences are valued and respected, where all employees can be authentic, and equal opportunity is guaranteed to grow and contribute to their full potential.

We recognize that diversity enriches our culture, strengthens our team and fosters innovation. Therefore, we are committed to maintaining zero tolerance for any form of discrimination.

Some of the fundamental principles of our policy include:

- Ensure respect for all people.
- Promote equal opportunity
- Value diversity
- Ensuring psychological safety and non-discrimination

As an ALEATICA employee, we ask you to join us in this commitment by adhering to the following guidelines for conduct:

- Respect and value individual differences, recognising the importance of diversity in our work environment.
- Provide equal access to development and training opportunities, regardless of status or ethnicity, gender, sexual orientation, disability or other protected characteristics.
- Be transparent and accountable for our words and behavior, avoiding any form of harassment, discrimination or disruptive behavior.
- Comply with this Policy; and if at any time we observe a deviation or non-compliance to it, report it to the ethical channel I CARE.

We appreciate your commitment and collaboration to make ALEATICA a diverse, inclusive and equitable workplace.

Sincerely,

David Diaz
CEO