

POLICY TO COMBAT DISCRIMINATION, VIOLENCE AND HARASSMENT IN THE WORKPLACE

1. PURPOSE

The purpose of this policy is to prevent and combat all forms of discrimination as well as all violence and harassment that occurs in the course of employment and is either related to or arises from it.

2. FIELD OF APPLICATION

Management and all members of the company, employees, temporary employees, interns, trainees, prospective employees and other persons dealing or doing business with the company.

3. ZERO TOLERANCE STATEMENT ON DISCRIMINATION, VIOLENCE AND HARASSMENT - RISK ASSESSMENT

EVOX S.A. hereby expresses its commitment to address and eliminate discrimination, violence and harassment in the workplace to ensure an environment where respect for human dignity will prevail and discrimination based on personal characteristics and choices will not be allowed. It is stated that all forms of discrimination, violence and harassment in the course of work, whether related to or arising from work, are strictly prohibited.

Innuendo, mockery, obscene, sexual or racist jokes or comments, the use of offensive language, comments about someone's physical appearance or character that cause shame or embarrassment, stalking, stalking and unwanted verbal or physical attention towards someone, sending messages with sexual content via SMS, email are strictly prohibited, letter or social media, insulting and persistent questions about a person's age, marital status, personal life, sexual interests or preferences, and similar questions about a person's race or ethnicity, including cultural identity and religion, sexual gestures or persistent requests for dates or threats, insinuations that one's sexual favours may advance one's career or that refusal to enter into a sexual relationship may adversely affect one's career, rude gestures, touching and any kind of unwanted physical contact, the dissemination of malicious comments or insults, especially on the basis of discrimination on the grounds of age, gender, type of marriage, civil partnership, pregnancy and maternity, any disability, sexual preference, religion or belief, threats, whether verbal or by gesture, insults in public or in private, belittling or ridiculing a person or his or her abilities, whether in private or in front of others, outbursts of anger against someone, persistent or unjustified criticism, exclusion from

social events, working group meetings, discussions and collective decisions or planning, cyber bullying, offensive emails, letters and phone calls.

The company will investigate any such complaint, showing zero tolerance for discrimination, violence and harassment, with confidentiality and respect for human dignity, and will not obstruct the reporting of such complaints. It shall provide assistance and access to any competent public, administrative or judicial authority in the investigation of any incident of violence and harassment.

For employees and those associated in any way with the company who breach the obligations arising from this Policy, appropriate measures will be taken, where appropriate, to prevent and avoid a similar incident or behaviour from recurring.

4. TERMS

4.1. Distinctions

Discrimination is defined as discrimination based on sex, race, colour, ethnic or social origin, genetic characteristics, language, religion or belief, political opinion, disability or health status, age or sexual orientation.

4.2. Violence and Harassment Organization & Responsibilities

Violence and harassment are forms of conduct, acts, practices or threats thereof, which aim at, lead to or are likely to lead to physical, psychological, sexual or economic harm, whether occurring in isolation or repeatedly.

Harassment also includes conduct that has the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating, humiliating or offensive environment, regardless of whether it constitutes a form of discrimination, and includes harassment on the grounds of sex or other grounds of discrimination.

Harassment prohibited by this policy includes, but is not limited to:

- Verbal harassment (e.g. abusive comments, insults or accusations).
- Physical harassment.
- Visual forms of harassment, e.g. posters, cartoons, caricatures, photographs or drawings that are derogatory based on characteristics protected by law.
- Retaliation or intimidation for reporting or threatening to report any of the above-mentioned forms of harassment or for cooperating in the investigation of a harassment incident.

4.3. Sexual harassment - Sexual harassment

Gender-based harassment is the forms of conduct related to a person's gender that are intended to or have the effect of violating that person's dignity and creating an intimidating, hostile, degrading, humiliating, humiliating or offensive environment. These forms of conduct include sexual harassment, as well as forms of conduct related to sexual orientation, expression,

the identity or gender characteristics of the person. Sexual harassment is defined as unwanted conduct of a sexual nature, including unwanted sexual advances, requests for sexual favours and any other unwanted physical or verbal conduct of a sexual nature. Such conduct may be expressed by a person of either sex and includes harassment of a person of either sex. For illustrative purposes, some examples of sexual harassment are as follows:

- Offering benefits in exchange for sexual favours or creating an environment that promotes "sexual intercourse" as a means of professional development in the workplace.
- Retaliation or threat of retaliation after rejection of sexual advances.
- Obscene gestures, display of sexually offensive electronic and printed graphic materials (e.g. email, voice mail, books, files, photographs, etc.), cartoons or posters, or any material with obscene or sexual innuendo.
- Derogatory comments, sexual innuendo, use of sexual "language" or "jokes" of a sexual nature.
- Verbal sexual harassment or suggestions.
- Verbal abuse of a sexual nature: sexual comments about a person's body, use of sexually derogatory comments in describing a person, sexually suggestive or obscene comments in conversation, letters, invitations, notes or other comments, adjectives.
- Physical contact: touching, pinching, gestures of a sexual nature, hitting, grabbing, pushing, etc.

The above acts are indicative and do not constitute an exclusive list of prohibited acts. The employee or third party engaging in such prohibited conduct shall be and shall bear full responsibility for his or her actions.

4.4. Retaliation

It is prohibited for any employee or third party, in any way connected with him or her, to retaliate against another employee or third party who opposes violence or harassment of any kind, makes a complaint, testifies, assists or participates in any incident investigation process.

5. MEASURES FOR THE PREVENTION, CONTROL AND REDUCTION OF RISKS - INFORMATION AND COMMUNICATION ACTIONS AWARENESS RAISING

All employees and those associated in any way with the company must comply with this policy, which applies both in the workplace and in areas associated with company meetings, conferences and work-related events, whether physically present, online or by telephone.

This ensures an accessible, safe and friendly working environment where the relationships between employees, partners and management are characterized by mutual respect, courtesy, honesty, understanding, trust, cooperation and support.

The company shall take all reasonable measures and make all reasonable adjustments to working conditions to protect employment and support employees who are victims of domestic violence. It also takes all necessary measures to inform and raise awareness among staff, using appropriate means (e.g. printed and electronic materials, etc.) to combat violence and harassment, ensuring that everyone is aware of the policy and procedures against incidents of violence and harassment and knows where to turn in case of violence or harassment.

Managers are trained to recognise discrimination, violence and harassment at work and to provide the necessary support to staff and partners.

Employees are encouraged to report incidents of discrimination, violence and harassment in the workplace.

6. REPORTING, INVESTIGATING AND DEALING WITH COMPLAINTS

If any employee or a third party connected in any way with the company believes that he or she has been subjected to discrimination, violence or any form of harassment, or if he or she has observed that such behaviour is taking place in the workplace, he or she must report the incident. The company will treat all incidents of reporting discrimination, violence and harassment with the utmost confidentiality and discretion.

If any employee or third party connected in any way with the company believes that he or she has been subjected to retaliatory behaviour as a result of filing a complaint or assisting in the process of investigating incidents of discrimination, violence and/or harassment, he or she must immediately inform the management.

Complaints of conduct in violation of this policy will be accepted in writing, anonymously or not, and will be investigated promptly and thoroughly. To maintain workplace safety and the integrity of investigations, the company may move employees or modify their work schedules pending the outcome of the investigation. During this period, partial or total access to buildings and/or facilities may not be permitted.

If the outcome of the investigation shows that an incident of discrimination, violence or harassment or retaliation has taken place, the company will take appropriate corrective, disciplinary and/or other actions. These actions may include:

- (a) disciplinary sanctions,
- (b) a change of position, working hours, place or manner of performing the work;
- (c) termination of an employment or cooperation contract,
- (d) legal actions.

In any case, the infringer may also be subject to criminal or civil liability, in accordance with the applicable legislation. These Regulations shall apply in parallel with the general legislation in force on the protection of the employee's personality and shall not affect his/her legal rights under civil and criminal law, as well as his/her rights to lodge a complaint with the competent supervisory authority.

7. MALICIOUS ALLEGATIONS

Complaints which are proven to be manifestly malicious will be considered unacceptable and will be further investigated both as to the motives and the parties involved, in order to restore order by all lawful means and means.

8. FURTHER INFORMATION - REFERENCE PERSONS

All queries relating to the implementation or interpretation of this policy should be submitted to the Management, who is designated as responsible for informing and advising staff and for matters relating to the prevention and management of violence and harassment in the workplace.