



# Prevention of Harassment and Discrimination Global Policy



## OBJECTIVE

To establish the governance and guidelines to prevent and eradicate from the organization any action, attitude or behavior that may be classified as Harassment or Discrimination.

## DEFINITIONS

### *Discrimination:*

Treating a person unfavorably because of who they are or because they possess certain characteristics, including the legally protected categories by the local regulations where we operate. These characteristics, according to the ILO Discrimination Convention, include but are not limited to race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, disability, age, health condition, and way of thinking (political, religious, and social views).

Any distinction, exclusion, or preference in respect of a particular job based on the inherent requirements thereof shall not be deemed to be Discrimination.

### *Harassment:*

Behaviors that create or produce an intimidating, hostile, or abusive environment. These include, but are not limited to:

- ***Abuse of Power:***

Improper use of power by someone in a position of authority, using it as leverage to oppress others. It can take place as:

- Requesting staff to do personal errands or favors.
- Pressuring staff to distort facts or break rules.



- **Aggressive Conducts:**  
Include but are not limited to bullying, offensive jokes, slurs, name calling, physical assaults or threats, intimidation, ridicule, insults, offensive objects or pictures.
- **Sexual Harassment:**  
Unwelcome sexual advances, requests for sexual favors, and verbal or physical harassment of a sexual nature.

### ***Integrity and Transparency Helpline (ITH):***

Sigma's official reporting method managed by Alfa, its holding company. It is an autonomous and confidential tool that ensures the safety and privacy of the parties involved as well as fair treatment to each case and a proper follow-up.

### ***Retaliation:***

To act against another in a vengeful fashion as a result of some prior action. It includes being treated less favorably for reporting misconduct, participating in a misconduct investigation or lawsuit, or opposing misconduct. Some examples of Retaliation are:

- Work-related threats, warnings, or reprimands.
- Making false reports.
- Scrutinizing work or attendance without justification.
- Engaging in abusive verbal or physical behavior.

## **POLICY**

In accordance with the ILO Discrimination Convention, all Organizational Units (hereinafter OU) must abide by the strictest requirements among those included in this Policy or local laws and regulations, promoting a safe and Harassment and Discrimination-free environment, and communicating them to all employees at least once per year, complying with the following minimum requirements:

### **Preventive Measures:**

All OUs must:

- Prohibit Harassment and Discrimination.
- Socialize the ITH throughout the organization.
- Address the guidelines defined in this Policy in the on-boarding to new-comers, stating it's our responsibility to help create a dignified work environment.



- Document all reports, including all actions taken in each case.

Additionally, OUs can define and deploy measures according to local needs such as:

- Anonymous work environment surveys to reveal potential issues and hotspots.
- General trainings and awareness sessions to all employees about unconscious bias and how to build a Harassment and Discrimination-free environment.
- Specific trainings for those individuals responsible for addressing or following-up on Harassment reports, including but not limited to: how to recognize warning signs, what to cover in the investigation, guidelines for interviews, “must-do” and “must-not” for the closure process, and guidelines for a proper follow-up once a case is closed.

### Roles and Reporting:

Employees who feel they were subject to Harassment or Discrimination by someone related to the company, must report the situation. The use of the ITH is strongly encouraged.

Employees who are aware of a possible violation to this Policy, even if the violation affects another employee, are encouraged to report the incident even if the victim of the alleged Harassment or Discrimination refuses to report the situation.

Supervisors and the Human Capital responsables who are aware of possible Harassment or Discrimination must report the allegation through the ITH and facilitate the investigation process as defined by Alfa’s Audit team. Failure to do so may be cause for disciplinary action.

Any employee, including supervisors or Human Capital responsables, who discourage other employees from reporting Harassment or Discrimination incidents as required by this policy, will be subject to disciplinary action.

All inquiries and reports will be attended and classified by a third party in Alfa. It is important to note that none of the involved individuals will be part of the investigation or resolution team.

Alfa shall assign each case to a proper subject matter expert within Alfa’s Audit team or within Sigma in order to perform a full investigation, evaluate the situation and provide guidance about the procedure to the involved employees.



The final decision and course of action will be made by a committee formed as required by the case, taking into consideration all the compiled data.

### Prohibition of Retaliation:

Sigma prohibits any and all Retaliation against an employee for reporting Harassment or Discrimination.

To prevent Retaliation from occurring, all parties involved should keep the matter as confidential as possible under the circumstances to preserve the integrity of the investigation process.

Any employee who feels he or she was subject to Retaliatory action must immediately report the situation through the ITH.