

ANTI HARASSMENT AND DISCRIMINATION POLICY

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PRINCIPLES

Our Code of Ethics highlights the commitment of all the companies of the GMV Group, (hereinafter GMV) to the principles of business ethics and specifically to the human and labor rights recognized in legislation and international agreements. It is established that professionalism and integrity are guiding criteria for the conduct of GMV professionals and the principles of non-discrimination, respect for personal and family life and the right to privacy are enshrined.

GMV publicly states that it has a zero-tolerance policy for any type of harassment, harassment or discrimination based on race, religion, beliefs, sex, sexual orientation, gender identity, age, national origin, and disability. In the same way, GMV actively strives to ensure the absence of discrimination on other grounds, including gender expression, disease or health condition, serological status, and/or genetic predisposition to suffer pathologies and disorders, language, socioeconomic situation, opinion, marital status or any other personal or social condition or circumstance.

For the purposes of this policy, **harassment** is understood as persistent and unwanted conduct that is Based on race, color, religion, sex (including sexual orientation, transgender status, or pregnancy), national origin, older age, disability, or genetic information (including family medical history). It can be based on protected characteristics such as the ones listed above, but it can also be related to other abusive behaviors. Similarly, discrimination is defined as unequal or unfair treatment of a person or group of people based on characteristics protected by federal and state law.

Consequently, GMV expressly prohibits abuse of authority and workplace harassment, in any of its manifestations (moral, sexual, based on sex or sexual orientation, sexual identity, gender expression and sex characteristics). It also expressly prohibits any other conduct that may create an intimidating, offensive or hostile work environment for individuals.

In accordance with these principles, GMV is committed to creating, maintaining and protecting, at all times, a work environment where the dignity of the person, the rights and values referred to above are respected.

The Anti-Harassment and Discrimination Policy aims to define guidelines that allow us to identify a situation of harassment, in order to solve a discriminatory situation, by taking reasonable steps to prevent and correct wrongful behavior in the workplace. Until the situation of harassment is identified and proven, the principle of presumption of innocence of the alleged harasser will prevail.

A list of applicable terminology on harassment and discrimination can be found in Annex I to this document.

OBJECTIVE OF THIS POLICY

The purpose of this policy is to prevent and eradicate situations constituting harassment in all its forms, with GMV assuming its responsibility in order to eradicate an environment of conduct contrary to the dignity and values of the person.

In accordance with the commitment to prevention and action against the conduct described in the following sections, it is reported that it can be applied and implemented by all the people who provide services at GMV; both staff and people from companies that provide services for GMV, as well as those who, not having an employment relationship, are in the process of formalizing it or collaborate with the organization.

If the person who violates this policy is outside GMV's management power, it will be immediately communicated to the company to which he or she belongs, urging it to

deploy action and take the necessary measures to evaluate, analyse and make a decision with respect to this conduct.

To this end, this policy considers two fundamental aspects: the prevention of harassment and the company's reaction to complaints of harassment. Consequently, two types of actions are considered:

1. Establishment of measures by which GMV seeks to prevent and avoid situations of harassment that may constitute harassment or discrimination.
2. Establishment of an internal procedure for action in cases in which, even in an attempt to prevent such situations, there is an internal complaint or complaint of harassment by an employee.

PROHIBITED CONDUCT

The following is a list of the main zero-tolerance behaviors on the part of GMV, the occurrence of which will immediately trigger this protocol. This list is not exhaustive and may be expanded according to the circumstances.

- Sexual harassment: any verbal, physical or digital behavior of a sexual nature that has the purpose or effect of violating the dignity of a person, in particular, when it creates an intimidating, degrading or offensive environment.
- Harassment based on sex: any behavior carried out on the basis of a person's sex, with the purpose or effect of violating their dignity and creating an intimidating, degrading or offensive environment.
- Psychological harassment: any practical conduct or behavior carried out systematically or recurrently within an employment relationship, which directly or indirectly undermines or violates the dignity of the worker, to whom an attempt is made to subject emotionally and psychologically in a violent or hostile manner, and which seeks to nullify his or her ability to promote himself or her in the workplace, negatively affecting the work environment.
- Harassment based on sexual orientation or gender identity: any gestural or verbal conduct, behavior or attitude carried out on the basis of a person's sexual orientation or gender identity with the purpose or effect of violating their dignity and creating an intimidating, degrading or offensive environment.
- Unlawful harassment: conduct with the purpose of intimidating and/or creating a hostile work environment.

MEASURES TO PREVENT HARASSMENT AND DISCRIMINATION

In order to prevent harassment and discrimination, situations potentially constituting harassment or discrimination, GMV establishes the following measures:

- GMV promotes an environment of respect and correctness in the work environment, instilling in all professionals the values of equal treatment, respect, dignity and free development of personality.
- GMV seeks the integration of new staff, avoiding situations of isolation by monitoring the worker not only in their initial reception process, but also after it. GMV will take into account the personal or cultural circumstances of the person incorporated and will take them into account in order to contribute to their integration.
- GMV provides information and training to professionals on the principles and values that must be respected in the company and on the conduct that is not allowed.
- GMV prohibits insinuations or statements that are contrary to the principles outlined above, both in language, communications and attitudes.
- When conduct that is not acceptable in a given group or work team is detected, GMV's Management will immediately contact the person in charge

of the same, in order to inform him or her of the situation detected, the obligations that must be respected and the consequences that arise from non-compliance, holding the meetings that, where appropriate, will be held proceed, to analyze what happened and normalize behaviors.

- GMV will ensure that these measures are not only complied with in face-to-face workspaces, but also when work is carried out remotely, at customer facilities or visits to suppliers, in conversations held by digital tools and in face-to-face meetings with third parties.

GMV is constantly updating the existence of potential risks and, consequently, in the adoption of new measures or improvements to existing ones, which allow optimal coexistence at work to be achieved, safeguarding the rights of professionals. The protocol will be updated and reviewed at least once a year to ensure its continuous alignment with the needs of society and GMV, incorporating on a mandatory basis the modifications derived from legislative changes and other events that require it.

PROCEDURE FOR ACTION IN THE EVENT OF A COMPLAINT OF HARASSMENT OR DISCRIMINATION

The procedure will be activated by communicating or informing any of the conduct described above to your immediate supervisor or department manager, or through the communication channels made available by GMV. Likewise, the company may activate it if it has reasonable indications of its occurrence.

All communication must provide data or evidence on the specific fact that is reported, maintaining the confidentiality of the complainant throughout the process.

Guiding principles of the procedure

This procedure is governed by the following principles:

- Protection of the privacy, confidentiality and dignity of the people involved.
- Protection of the allegedly harassed worker in terms of his safety and health.
- Fair hearing and fair treatment for all affected people.
- Guarantee of preservation of the identity and circumstances of the person who complains.
- No disclosure of any information to parties or persons not involved in the case, except as necessary for the investigation.
- Urgent processing, without undue delays.
- Professional and thorough investigation of the facts denounced.
- Adoption of measures of all kinds, including, where appropriate, disciplinary measures, against the person(s) whose harassment or discrimination is proven. Any false accusation, accusation or complaint in relation to these behaviors is also considered reprehensible and deserving of reproach, and the necessary measures are adopted.

Procedure, Outcome and Actions

The investigation will be conducted in accordance with the aforementioned principles. During the investigation, precautionary measures may be established. If any action contrary to this protocol is confirmed, GMV will adopt the corresponding disciplinary measures.

If the existence of behaviors defined in the previous sections is not confirmed, but a significant personal conflict is revealed, appropriate measures may be taken to resolve the conflict.

Any retaliation against individuals who report, testify, assist, or participate in

investigations, as well as against those who oppose any harassment situation against themselves or others, is expressly prohibited. Notwithstanding the above, if the investigation reveals that the alleged victim acted with proven bad faith or intent to harm, GMV may adopt the measures it deems most appropriate.

PUBLICITY AND ENTRY INTO FORCE

Its content will be effective as of its date of publication and will remain in force until it is modified or replaced by another one.

ANNEX I

LIST OF DEFINITIONS

- **Bully¹:** Someone who acts deliberately and aggressively affecting the victim, making them feel vulnerable and unable to defend themselves.
- **Hate speech:** Any type of communication, whether oral or written, or also behavioral, that attacks or uses pejorative or discriminatory language in reference to a person or a group based on who they are, in other words, based on their religion, ethnicity, nationality, race, color, ancestry, gender, and other forms of identity.
- **Gender expression:** Manifestation that each person makes of their sexual identity.
- **LGTBI family:** One in which one or more of its members are LGTBI people.
- **Phobia:** Exaggerated aversion to someone or something.
- **Sexual identity:** Internal and individual experience of sex as each person feels and defines it, which may or may not correspond to the sex assigned at birth.
- **Intersex:** The condition of those born with biological, anatomical or physiological characteristics, or a sexual anatomy, reproductive organs or chromosomal pattern that do not correspond to socially established notions of male or female bodies.
- **Sexual orientation:** Physical, sexual, or emotional attraction to a person. This orientation can be heterosexual, when there is physical, sexual or emotional attraction only towards people of different sexes; homosexual, when they feel towards people of the same sex; or bisexual, when they feel towards people of different sexes, not at the same time, nor in the same way or degree of intensity.
- **Trans person:** A person whose sexual identity does not correspond to the sex assigned at birth.
- **Complaint:** Problem, concern or claim, of an individual nature, made by a person for the treatment they have received in the workplace, as an attack on their rights.
- **Racism:** Belief that sustains the superiority of one ethnic group over others, which leads to discrimination or social persecution.

¹ <https://violenceagainstchildren.un.org/es/content/acoso-y-ciberacoso>