

# POLICY FOR THE PREVENTION OF SEXUAL HARASSMENT, WORKPLACE HARASSMENT AND WORKPLACE VIOLENCE

Updated June 2024



#### 1. Introduction

Grupo Security promotes and demands a work environment where people are treated with respect and dignity, protecting their physical and psychological integrity from sexual and workplace aggression and any form of workplace violence. Cognizant that harassment and violence threaten people's dignity and health, Grupo Security has developed a comprehensive policy to prevent and penalize these behaviors, promoting a positive work environment and a culture of integrity, as part of its commitment to the National Occupational Safety and Health Policy and Convention No. 190 of the International Labor Organization.

Grupo Security takes a proactive stance in creating and maintaining a safe, respectful work environment. This strategy not only protects employees, but also reinforces the company's reputation as a responsible employer committed to the well-being of its personnel. By implementing these policies, Grupo Security guarantees a productive work environment based on values like integrity, respect, fairness and trust, thus complying with legal regulations and promoting a healthy, safe work environment for all.

Grupo Security's policy of zero tolerance for workplace harassment, sexual harassment and workplace violence includes ongoing training programs to sensitize employees to the importance of an environment free of harassment and violence. In addition, specific channels have been set up for reporting such conduct, ensuring that all complaints are thoroughly and impartially investigated. Procedures for investigating cases are clear and transparent, assuring that appropriate disciplinary action is taken when necessary.

#### 2. Objective and Context

This policy sets forth the basic principles by which the company and all its employees must abide to prevent all forms of sexual and workplace harassment and workplace violence, as well as guidelines to be followed by employees and each Group company in the event such situations occur.

# 3. Regulatory References, Other Internal Organizational Policies and/or Adherence to International Codes

This policy has taken into consideration the following regulations:

- Political Constitution of the Republic of Chile.
- Convention 190 of the International Labor Organization.
- Labor Code.
- Law No. 21,643, which amends the Labor Code regarding the prevention, investigation and penalization of workplace harassment, sexual harassment and workplace violence.
- Law 21,675, which defines measures to prevent, penalize and eradicate gender-based violence against women.
- ORD. 362/19 of the Labor Bureau, which establishes the meaning and scope of the amendments introduced by Law 21,643 to the Labor Code.
- Circular No. 3813 of June 7, 2024, issued by the Superintendency of Social Security.



### 4. Definitions

In the context of this policy, the following key terms are defined to guarantee clear and consistent interpretation, ensuring that all employees, visitors and customers adequately understand the standards of conduct expected within Grupo Security.

- **Sexual harassment**: When a person makes undue demands of a sexual nature, by any means, without the consent of the person receiving them and which threaten or harm their employment situation or employment opportunities.
- Workplace harassment: Any conduct that constitutes aggression or bullying by the employer or one or more employees, against another or other employees, through any means, either on one occasion or repeatedly, which results in the belittling, abuse or humiliation of the affected party or parties, or threatens or harms their work situation or employment opportunities.
- Workplace violence exercised by third parties outside the employment relationship: Conduct by customers, suppliers, users, visitors or other third parties outside the employment relationship that affect employees when providing a service.

# 5. Application (Scope)

This policy applies to all employees of Grupo Security, including managers, supervisors and all other levels of the organization. Workplace violence also extends to visitors and customers accessing our facilities to ensure a safe, respectful environment for all involved.

## 6. Application Criteria

Cognizant that improving working conditions impacts both productivity and the work environment, and considering that harassment is detrimental to the employees directly affected and also has repercussions on their immediate environment and on the institution as a whole, Grupo Security is committed to preventing harassment and dealing with any incidents that may occur using the following principles:

- Everyone has the right to be treated properly, respectfully and with dignity and to have his or her privacy and physical and moral integrity respected, and should not be subjected under any circumstances, for any reason whatsoever, to degrading, humiliating or offensive treatment.
- Grupo Security employees have the right to effective protection in terms of occupational health and safety and a corresponding duty to protect themselves by preventing risks arising from their work, including those related to harassment and violence.
- Grupo Security will maintain a risk-free work environment and undertakes to adopt the necessary organizational, training- and information-related measures to prevent harassment of the personnel providing services therein.
- Employees who believe they have been victims of harassment and workplace violence are entitled, notwithstanding any administrative and legal action they may take, to file a complaint under the terms of the Internal Order, Hygiene and Safety Rules.

Grupo Security will develop a specific action procedure to act against any form of workplace and sexual
harassment and workplace violence. This procedure complements, but does not replace, interrupt or
extend, the time periods for claims and appeals before the Labor Inspection Board and the Courts of
Justice established by current regulations. This procedure for dealing with cases of workplace
harassment, sexual harassment and workplace violence will be made available to all employees in the
Internal Hygiene and Safety Rules and will be posted on the intranet.

### 7. Policy Governance

- Policy Ownership: This document must be approved by the Board of Directors of Grupo Security and the respective directors of its subsidiaries. The Corporate Culture Labor Relations Department is responsible for the interpretation and application of this policy.
- b. Validity and review of the policy: This document will take effect once approved by the Board of Directors of Grupo Security and its respective subsidiaries.

#### 8. Updates

This policy will be communicated to employees by publishing it on the Corporate Intranet, and will have an initial duration of 2 years, after which it will be amended if necessary.