

PROTOCOL

FOR THE PREVENTION AND
RESPONSE TO SITUATIONS
OF DISCRIMINATION,
HARASSMENT, AND VIOLENCE

Guidelines for respectful
and inclusive conduct



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1. PURPOSE AND OBJECTIVE

Industrias Guidi is committed to creating an environment that fosters fair and honest treatment for all individuals associated with the organization, as established in the Company's Code of Conduct. In this regard, the Code states: *"We seek to provide an environment in which people feel comfortable and respected, regardless of their individual characteristics, whether political, religious, sexual orientation, gender, or any other, offering a workplace where no form of discrimination or harassment is tolerated."*

In the same vein, the Code also establishes that *"the treatment of our employees toward external parties must take place within a framework of mutual respect and cordiality, and under no circumstances should there be written or verbal abuse from either side."*

Likewise, this internal regulation establishes that *"it is the responsibility of everyone at Industrias Guidi to respect and ensure respect for the human rights of all those with whom we interact."*

The **Protocol for the Prevention and Response to Situations of Discrimination, Workplace Harassment, and Violence at Industrias Guidi** (hereinafter, the "Protocol") seeks to operationalize the principles and standards set forth in the Code of Conduct regarding treatment within the employment environment, as well as to establish guidelines for addressing situations of discrimination, harassment, and workplace violence. In this sense, it provides tools to safeguard respect for human rights, promote a work environment free from violence, and protect affected individuals.

The objective of this Protocol is to clearly establish the standards of respect and dignity promoted in interpersonal relationships within Industrias Guidi and to create a procedure that provides guidelines for the prevention, guidance, response, and resolution of situations of discrimination, harassment, and workplace violence that may arise.

2. SCOPE

2.1 With respect to individuals

This Protocol applies to all individuals with an employment relationship with Industrias Guidi, regardless of hierarchy, applicable collective bargaining agreement, professional category, age, gender, or seniority. It also applies to external individuals such as contractors and personnel from third-party companies who perform work for or are otherwise connected to Industrias Guidi.

2.2 With respect to the workplace

This Protocol applies to situations that arise in any workplace where Industrias Guidi operations are carried out. The concept of workplace is understood broadly to include:

- Workstations and work areas in production plants and offices.
- Rest areas, dining facilities, and sanitary facilities.
- Environments in which business travel, training sessions, events, or company-sponsored social activities related to work take place.
- Communications arising from work-related relationships, including contacts generated through social networks or other technological platforms.

3. DEFINITIONS AND APPLICABLE CONCEPTS

The definitions set forth in this Protocol are intended to provide clarity regarding the conduct that this Protocol seeks to prevent, sanction, and eradicate. However, these definitions should not be interpreted in a limited or restrictive manner. Any conduct that generally undermines a person's dignity shall fall within the scope of this Protocol.

Discrimination and/or harassment and/or violence shall be considered objectionable and unacceptable conduct.

3.1 Workplace Violence and Harassment

Violence or harassment may manifest in the form of physical violence, sexual harassment, gender-based harassment, cyber-harassment, psychological harassment, and discrimination.

Such conduct may occur vertically—either upward or downward (between individuals at different hierarchical levels)—or horizontally (between colleagues, whether or not they belong to the same team), in circumstances related to work.

3.1.1 Physical Violence

Refers to acts of aggression that cause physical harm and/or discomfort to the affected person.

Examples include, but are not limited to:

- Physical attacks (such as pushing, kicking, punching, and/or slapping).
- Throwing objects with the intent to cause harm.
- Damaging objects or personal property or company property (e.g., puncturing car tires, destroying documentation, damaging machinery).

3.1.2 Sexual Harassment

Any conduct of a sexual nature that affects the dignity of the person receiving it.

As a result of such conduct, the affected person may feel threatened, humiliated, and/or intimidated, creating a hostile condition in their current work situation and/or future growth opportunities.

Examples include, but are not limited to:

- Sexual invitations or propositions.
- Sexual questions or insinuations.
- Comments about a person's body, physical appearance, sexuality, and/or sexual orientation.
- Circulation of messages with sexual overtones or pornographic/offensive content.

3.1.3 Cyber-Harassment

Refers to the distribution of offensive, harmful, or false messages and/or publications about a person that may cause harm, humiliation, defamation, or discredit, through social networks or any technological platform, including SMS, WhatsApp, email, instant messaging, forums, etc.

3.1.4 Psychological Harassment

Includes behaviors of humiliation, degradation, and/or threats, verbal aggression, and disrespect. It often manifests through arbitrary and unjustified decisions, aggressive messages such as insults, degradation, or systematic exclusion from work meetings.

3.1.5 Discrimination

Any practice or distinction based on gender, sexual orientation, age, disability, physical appearance, religion, ethnicity, social origin, nationality, health condition, and/or any other arbitrary and unjust¹ condition that undermines a person's dignity.

Examples include:

- Making jokes or remarks with sexist, homophobic, or racist content.
- In a work-related discussion or exchange, denigrating or mistreating a person due to any of the aforementioned personal characteristics.
- Excluding or showing evident indifference or continuous isolation toward a person in work meetings or work-related social activities.
- Circulating or publishing photographs, drawings, screenshots, notes, or other offensive materials.

¹In accordance with National Law No. 23,592 on Discriminatory Acts

4. FUNDAMENTAL PRINCIPLES IN THE APPROACH

Confidentiality: Any person who shares experiences or information regarding events of discrimination, harassment, or violence within Industrias Guidi has the right to strict confidentiality regarding the information provided (including the content of reports, both during the analysis process and after resolution). When necessary, only the strictly required information will be disclosed to guarantee the right of defense of the accused person, and such information will be limited to the accused individual(s).

Informed consent: Throughout the process, clear information will be provided regarding the purpose of the intervention, confidentiality obligations, the potential use of collected information, available procedures for the affected person, and the pros and cons of each procedure. Actions shall be taken with caution and respect for the reporting person's decisions, informing them that no action will be taken without their knowledge. At all times, decisions made under this Protocol will seek to protect the affected person without exposing them, while conveying a zero-tolerance message toward any form of workplace harassment or violence.

Non-retaliation: Industrias Guidi shall take all necessary measures to protect individuals who submit reports in good faith, act as witnesses, provide information, or otherwise participate in procedures under this Protocol.

Transparency and accountability: Industrias Guidi commits to establishing periodic information mechanisms for company personnel to report on measures adopted to advance the prevention, management, and eradication of workplace violence and harassment. The objective of this accountability policy is to contribute to the construction and promotion of a culture of respect for human rights in the workplace.

5. IMPLEMENTATION OF THE PROTOCOL

5.1 Dissemination and Training of the Protocol

With regard to the implementation of the Protocol, Industrias Guidi undertakes to communicate and train its employees on its application and scope.

Likewise, the Company commits to including topics related to the prevention of workplace violence in its annual training plan.

5.2 Reporting Channels

All behaviors and practices that constitute forms of discrimination, violence, and/or harassment, as defined by this Protocol, may be subject to claims, complaints, or reports through the established channels. Any person covered by this procedure may use the following reporting channels:

- **Human Resources**, in person at the Burzaco and Zárate plants, or by telephone at +54 11 6074 0900, extension 137, for both plants.
- **Through the company website** www.industriasguidi.com.ar, by submitting a suggestion or report using the designated buttons.

5.3 Evaluación, investigación y análisis de los casos

As an initial measure, a **Workplace Coexistence Committee (WCC)** shall be established, in accordance with the applicable Annexes, to assess whether the report is sufficiently serious to warrant the initiation of an investigation or whether the case constitutes a complaint regarding non-compliance.

If the reported situation does not constitute a serious offense², the WCC shall analyze the case and carry out pedagogical, communicative, or guidance-oriented actions aimed at discouraging such practices and informing that any recurrence may result in sanctions. If the report involves a serious situation or repeated conduct, the WCC shall conduct the investigation process.

The WCC shall analyze the information provided in the report and, where necessary, provided that the report is not anonymous, shall conduct an interview with the reporting person to obtain further details. Subsequently, evidence-gathering measures shall be undertaken and analyzed to facilitate a better understanding of the situation under review.

The entire procedure shall be duly documented in a case file containing the following information:

² It refers to the type of intervention to be carried out, rather than to the impact on the person receiving it.

- Identification of the report.
- Full name and position of the reporting person (if not anonymous).
- Full name and position of the reported person.
- Description of the facts, including the timeframe.
- Supporting documentation submitted as evidence, such as meeting minutes and/or transcripts, interviews and/or witness statements; emails; screenshots of WhatsApp messages; audio messages; security camera footage; records of similar prior incidents, among others.
- Background information on the reported person (previous disciplinary actions, absenteeism, turnover, accidents).
- Particularities of the applicable collective bargaining agreement, if any (where one or more of the individuals involved are covered by such agreement).
- Observations, recommendations, and intervention strategies.
- Workplace risk analysis (in accordance with section 5.5 of this Protocol).
- Assessment of possible protective measures for the reporting and/or affected person.
- Report on the findings of the investigation, conclusions, and measures adopted.

The timelines for the investigation stage shall be determined according to the complexity of the case but shall not exceed 30 days.

5.4 Risk Indicators

Reports shall be analyzed based on the following risk indicators³:

- Whether the reported person supervises other employees.
- Whether the reported person holds a direct leadership role over the reporting person.
- Whether the discrimination, harassment, and/or violence extended beyond the workplace (external meetings, business trips, social events, commuting, etc.).
- Whether the conduct was repeated, either involving the same person or others.
- Whether physical and/or sexual violence occurred.
- Whether the individuals involved perform tasks in night-time and/or isolated work environments.
- Whether there are vulnerability factors affecting the reporting person, such as discrimination based on gender, age, sexual diversity, disability, among others.

³They may arise from working conditions, work modalities, the organization of work, and human resources management, and are linked to situations of discrimination, the abuse of power relationships, and gender, cultural, and social norms that foster violence and harassment (ILO, 2019).

5.4 Assessment of Protective Measures

The adoption of protective measures shall be assessed in order to put an end to exposure to the risk of workplace harassment and violence. In cases where the presence of the reported person may cause further harm to the alleged affected person, hinder the evaluation process, or influence potential witnesses, the following protective measures may be adopted, subject to the consent of the affected person:

- Separation of physical workspaces between the individuals involved.
- Transfer of one of the involved individuals to another work area or shift.
- Temporary suspension of the reported person.
- Telework for a defined period for one of the involved individuals, where feasible given the nature of the tasks.

In all cases, protective measures shall be adopted with the consent of the affected person, ensuring that they do not override their will but rather respond proportionately to the situation reported to the WCC.

5.5 Final Report

Once all information has been collected and the case file has been properly completed, the WCC shall prepare a report outlining the findings of the investigation, conclusions, and measures adopted in its resolution. Such measures may include sanctions, actions to prevent recurrence, and supervision of the reported person.

5.7 Disciplinary Measures

Disciplinary measures shall vary depending on the severity of the conduct. The following measures may be considered, all of which shall be recorded in the reported person's personnel file:

- Verbal and/or written warning.
- Training aimed at modifying behaviors and reversing patterns that generate workplace discomfort.
- Formal reprimand.
- Suspension without work duties or pay for a period deemed appropriate to the offense.
- In cases of verified conduct of significant severity, recommendation of termination with just cause, in accordance with applicable labor legislation.

Additionally, the following measures may be applied:

- Exclusion of the sanctioned person from participating in events and/or special activities for a period determined by the WCC.
- Reflection of the sanction in the annual performance evaluation.

The reported person shall be informed of the decision adopted and its consequences. Such notification shall be made verbally and in writing and shall bear the signature of the reported person. Should the reported person refuse to acknowledge the

notification in writing, it may be sent to their domicile by means of a formal legal notice (Carta Documento).

Decisions of the WCC shall be adopted by consensus among all its members. All efforts shall be made to reach such consensus; failing that, the outcome of the investigation shall be escalated to the Human Resources Department.

5.8 Follow-up

Once the case has been resolved, the parties shall be informed of the decision. Human Resources shall be responsible for monitoring the actions defined for each case and the sanctioned person. Follow-up shall begin once the decision has been adopted and communicated to the reported person and shall continue for a period of six (6) months.

5.9 Accountability

On an annual basis, the WCC shall communicate to the entire organization the main action guidelines related to the implementation of this Protocol. The aim is to promote the legitimacy of reporting channels and to disseminate the actions undertaken by Industrias Guidi regarding awareness-raising, prevention, response, assistance, and intervention in matters of discrimination, harassment, and workplace violence.

Under no circumstances shall this accountability process disclose individualized information about the cases analyzed, in order to protect the individuals involved.

ANNEX – WCC (UOM)

Workplace Coexistence Committee – GUIDI (UOM)

This Committee shall be established in cases involving one or more individuals covered by the UOM collective bargaining agreement. It shall be composed of one representative from each of the following areas:

- Human Resources
- Corporate Social Responsibility
- Union Representation
- The plant physician and/or Occupational Health and Safety personnel may be additionally convened, if deemed necessary based on the conduct under review.

In order to facilitate prompt action by the WCC, a WhatsApp group or a future replacement application may be created for the Committee members.

ANNEX – WCC (NON-UNION PERSONNEL)

Workplace Coexistence Committee – Non-Union Personnel

This Committee shall be established in cases not involving personnel covered by the UOM collective bargaining agreement. It shall be composed of one representative from each of the following areas:

- Human Resources
- Corporate Social Responsibility
- The plant physician and/or Occupational Health and Safety personnel may be convened, if deemed necessary based on the conduct under analysis.

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