

## Objective

The general objective of this Policy for the Prevention and Attention of Workplace Harassment (hereinafter, the "Policy") of Genomma Lab International, S.A.B. de C.V. and its direct and indirect subsidiaries (collectively "Genomma" or the "Company"), is:

- Express Genomma's determination to maintain an adequate work environment that respects the dignity of each person, where sexual harassment and harassment, in any of its forms or expressions, is considered unacceptable and is not tolerated under any circumstances.
- Prevent harassment, workplace violence and/or sexual harassment in the workplace to promote physical, mental and social health, which fosters favorable organizational environments that contribute to emotional well-being and improve the quality of life of collaborators and employees, increasing work productivity.
- Provide necessary information to promote and develop a culture of prevention and reporting against sexual harassment, workplace harassment and/or workplace violence.
- Raise awareness for procedures for the reception, as well as the proper handling and treatment, within Genomma, of complaints of sexual harassment, harassment, and/or workplace violence.

## Scope

This is a global policy, which applies to each collaborator, direct or indirect subsidiaries, activities, processes, and facilities of the Company.

This policy is extensive to suppliers, business partners, shareholders and third parties that establish business relationships or collaborative agreements with Genomma Lab.

## Definitions

The following terms, used with a capital letter in this Policy, have the following meanings (all terms that are used in their singular form in this Policy will have the same meaning when used in their plural form, and vice versa):

**Code of Conduct and Ethics:** The current existing Code of Conduct and Ethics of Genomma Lab International, S.A.B. de C.V.

**Ethics Committee:** Auxiliary body of the Board of Directors of Genomma Lab International, S.A.B. de C.V., in charge of guaranteeing and monitoring the correct compliance with the Code of Conduct and Ethics.

**Complaint:** Manifestation of allegedly irregular events that are made known to the competent authority and/or, where appropriate, Genomma by the affected party or by a third party, which involve workplace harassment or sexual harassment wherein Genomma collaborators or third parties related to Genomma are involved.

**Complainant:** Person responsible for filing a complaint.

**Genomma:** Genomma Lab International, S.A.B de C.V. and its direct or indirect subsidiaries.

**Leader:** Collaborator who has one or more collaborating people under their charge, with the responsibility of giving them direction and ensuring a harmonious work environment for the correct fulfilment of their duties.

**Regulatory Framework:** A set of mandatory laws, norms, decrees and regulations that govern a specific country, state or locality where Genomma has operations.

**Affected person:** The person who has been directly or indirectly harmed by being the subject of an alleged workplace harassment or sexual harassment.

**Accused person:** Person who has been pointed out by the Complainant for possibly having carried out conduct with the effect of insulting the identity, personality, dignity or physical integrity of a Genomma collaborator, or who creates an intimidating, hostile, degrading or offensive work environment within the Company.

## Policy

### Basic principles

- **Dignity and defense of the person:** Everyone has the right to be protected against acts of workplace violence, workplace harassment and/or sexual harassment. This principle empowers the adoption of protection measures for both the Complainant and the Accused.

- **Healthy and harmonious work environment:** Everyone has the right to carry out work activities in a healthy and safe environment that preserves their physical and mental health, as well as their dignity, and that encourages their development and professional performance. Acts of workplace violence, harassment and sexual harassment are against this principle.

- **Confidentiality:** Any complaints and procedures known by the Ethics Committee, under this Policy, must be carried out under the strictest confidentiality and under the principle of total non-disclosure and privacy in relation, but not limited to, identity, intimacy, and personal data of those involved in any situations of harassment, bullying, and/or workplace violence.

- **Equal opportunities without discrimination:** Everyone has the right to be treated with respect in their workplace, with equal access to productive resources and employment. Any type of discrimination and violence is contrary to this principle.

At Genomma we are committed to promoting and preserving a work environment in which each of the aforementioned principles are applied and where collaborators are respected and treated with dignity, preventing, rejecting, and reporting all types of harassment, violence, bullying, as well as any activity that threatens the integrity of our team and/or third parties that have a relationship with Genomma.

- We must prioritize the early detection of harassment and the execution of actions to prevent and stop it. The prevention of workplace harassment and sexual harassment is both an individual and collective responsibility. Each collaborating person, at any level, and particularly in a leadership position, is responsible for building a positive work environment and a climate of trust and tolerance, free from any form of harassment, workplace violence and sexual harassment. The prevention and attention of conflict is also the responsibility of Genomma, who will be responsible for establishing the appropriate mechanisms for said purposes.

- All reports of harassment should be treated seriously. To this end, Genomma, through its Ethics Committee, is committed to resolving any complaint of possible harassment, bullying and/or workplace violence that occurs as soon as it is known, even if there is no formal complaint to the competent authorities. Collaborators have the obligation to report all cases of harassment, violence and/or bullying in the workplace.

- If proven, the harassment, violence or bullying must be sanctioned and the Accused person will be subject to disciplinary measures provided for in the applicable Regulatory Framework and/or in any other Genomma policies, including, but not limited to, the Genomma Code of Conduct and Ethics. Applicable sanctions must also be imposed on Leaders who knowingly allow harassment, violence or workplace bullying. On the other hand, collaborators must consider that accusations of harassment, bullying and/or violence are very serious, and false or malicious accusations must be sanctioned. Serious arguments are needed before filing a case of bullying, harassment and/or workplace violence. The alleged Accused person will have the right and obligation to respond to the accusations of which he is subject before the Ethics Committee.

## International Regulatory Framework

**Convention concerning Discrimination in Respect of Employment and Occupation, 1958 (No. 111).** ILO points out the obligation of States to formulate and carry out a national policy that promotes, by methods appropriate to national conditions and practice, equal opportunities and treatment in matters of employment and occupation, in order to eliminate any discrimination.

**Convention concerning Occupational Safety and Health and the Working Environment, 1981 (No. 155).** ILO points out the obligation of the States to put into practice a policy regarding the safety and health of workers and the environment at work.

Other provisions and laws similar and analogous to those mentioned above, applicable in the countries where Genomma operates, will also be considered.

### Definitions of non-tolerated behaviors

Notwithstanding and as a complement to the definitions mentioned above that are used in other sections of this Policy and/or in the applicable Regulatory Framework, which may vary depending on the country or jurisdiction, the following terms, used with an initial capital letter in this Policy, have the following meanings:

#### DEFINITIONS

**Harassment** is defined as the exercise of power in a relationship of real subordination of the victim to the aggressor in the workplace, which is expressed in verbal or physical conduct or both. It is a type of harassment characterized by any deliberate, offensive, unwanted conduct and incompatible with the Code of Conduct and Ethics, and which has the effect of:

- a) Insulting the identity, personality, dignity or physical integrity of a collaborator or group of collaborator; or
- b) Creating an intimidating, hostile, degrading or offensive work environment.

This includes **Moral Harassment**, which considers any repeated or persistent aggression, whether physical, verbal or psychological that has a negative effect on the work environment or that has the purpose of humiliating, denigrating, intimidating a collaborator or group and has the potential to affect health, career, or dignity.

**Sexual Harassment** is a form of violence in which, although there is no subordination, there is an abusive exercise of power that leads to a state of defenselessness and risk for the victim, regardless of whether it is carried out in one or more events.

It considers requests for sexual favors or verbal or physical conduct of a sexual nature when:

- a) The request or conduct becomes, explicitly or implicitly, a condition of employment; or
- b) The request or conduct has the purpose or effect of interfering with an individual's job performance by creating an intimidating, hostile or sexually offensive work environment.

Forms of sexual harassment include **Quid Pro Quo Harassment**, which occurs when sexual conduct is requested from the employee, either under the promise of a reward for consent or threat of reprimand for rejection, and **Harassment due to Hostile Work Environment** characterized by an intimidating and abusive work environment, which can alter the employee's working conditions.

#### EXAMPLES

The following examples are not exhaustive, and are meant to serve as a guide.

- Deliberately withholding work-related information necessary for the performance of duties.
- Persistently setting goals with unfeasible deadlines or impossible tasks.
- Exercising an unnecessary or excessive level of supervision or interfering in the work of the collaborator.
- Exclusion from professional activities and isolation from the work team.
- Behaviors designed to damage a person's reputation, both within the organization and outside of it.
- Using influence, power or authority to influence the professional career or working conditions of a collaborator, including assignment of tasks, contract renewal, performance evaluation or promotion.
- Criticisms focused on personal characteristics such as ethnic origin, age, gender identity or expression, sexual orientation, disability, physical characteristics or religion, and not on those related to professional performance.
- Aggressive behavior towards other people, for example, in the form of irrational anger, yelling, threatening language or gestures, name calling, or violence.

- Deliberate physical contact without the consent of the other party.
- Inappropriate attitudes in collaborative spaces.
- Comments or gestures in a sexual sense, including sexually explicit jokes.
- Behaviors of a suggestive nature via phone, message, email, social networks or during working hours.
- Persistent invitations to meet outside of the workplace.
- Displaying obscene or offensive images or texts without consent and within working hours.
- Propositions, without consent, with a sexual sense.
- Asking for sexual favors such as exchange of money, employment, goods, or assistance from a person.
- Pressuring a person to accept transactional sex.
- Abusing a situation of power or vulnerability of another person for sexual purposes.

**Condition-based Harassment** is constituted by all those harassing behaviors based on gender, age, religion, sexual orientation, disability, race, opinion or in any other circumstance, whether of a personal or social nature, in order to make it difficult for the harassed person to full integration.

- Aggressive behavior towards a person.
- Criticism and/or ridicule, insults and jokes focused on personal characteristics and/or on characteristics unrelated to job performance.

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## Harassment and Bullying Prevention

- Genomma, as well as the work team, have the responsibility to help guarantee a work environment in which dignity is respected, as well as the duty to implement the Policy against harassment, having the obligation to prevent it from happening, as well as the duty to report it in the case of being in person or being the victim of any type of harassment or bullying within Genomma.
  - Leaders have a specific responsibility towards their team and must be proactive in taking action towards any type of harassment that may arise. The Leader must be aware of the presence of these factors in their environment.
    - The existence of jokes, observations and jokes with a sexual sense.
    - Accentuated and unsubstantiated criticism of the work or behavior of certain collaborators.
    - Refusal to work with certain people.
    - When the medical diagnosis of the justifications for absences is related to the existence of stress in the collaborator.
    - Sudden loss of motivation, anxious attitude, poor performance or inexplicable errors in the execution of habitual tasks.
    - Once aware of the situation, the Leader must ensure that the pertinent actions are taken in accordance with the provisions of this Policy.
      - This Policy must be communicated to the entire work team, together with the Code of Conduct and Ethics. Additionally, a dissemination campaign will be carried out focused on preventing and eradicating harassment and bullying, and for the communication of the procedures to follow in the event of having experienced such a situation.
    - A module that considers the topic of prevention and reporting of harassment and bullying will be included in the induction training to the Company. Additionally, a mandatory training and awareness campaign will be carried out for the entire work team, managed by the Human Resources area and the Ethics Committee, with the aim of creating a culture of zero tolerance and providing prevention tools.

## Complaint procedure

1. Having been subjected to any form of bullying and/or harassment, the collaborator has the responsibility to act according to the complaint procedure.
2. The collaborator person who considers that he/she is in a situation of harassment or bullying must initiate the complaint process before the Ethics Committee, through the Ethical Attention System "GEN- Te Escucha".
3. The complaint can be initiated by anyone who has direct knowledge of the situation.
4. The complaint must clearly present the name of the person filing it and the name of the person against whom it is filed, and must specifically describe the statement of the facts, which must include the act or acts that occurred, the time, place and circumstances under which they occurred, as well as any other information and evidence relevant to the case, through the Ethical Attention System "GEN- Te Escucha".

## Investigation

Any complaint must be presented to the Ethics Committee, which will then be promptly investigated, in a fair and impartial manner. When the Ethics Committee becomes aware of the complaint, it will collect the corresponding information and take necessary measures to avoid any further damage or harm to the alleged victim.

- Genomma expects that all collaborators who have knowledge of the facts that are the subject of the complaint, will cooperate with the investigation carried out by virtue of this Policy.
- The investigation must begin as soon as possible after the complaint, to avoid inappropriate situations involving the Accused person.

## Confidentiality

In each investigation, the privacy of those involved must be respected. Confidentiality will be maintained during the investigation process.

### Notification to the Accused person

The Accused person will be notified about the investigation that is being carried out against them, the reason for it, and given the right to present evidence that is considered pertinent.

### Result of the investigation and sanctions

Upon completion of the investigation, the findings and planned actions will be communicated to the Complainant and to the Accused person.

In the event that the investigation determines that this Policy has been violated, the Accused may be subject to disciplinary or corrective measures, which will correspond to the Ethics Committee to determine, at its sole discretion, considering the seriousness of the facts and damages caused, attending to the provisions of the Code of Ethics and Conduct and this Policy. This may include, but is not limited to: verbal or written reprimand, suspension or termination of employment.

Genomma is obliged to report to the corresponding authorities any act that is likely to constitute a crime.

A written record of the complaints and procedures known by the Ethics Committee will be carried out, including the resolutions and corrective measures applied.

If the investigation determines that there was no situation involving harassment or bullying, the result will be communicated to the Complainant in an empathetic way and actions will be proposed that contribute to promoting a good work environment.

### Protection against retaliation

We do not take any type of retaliation (threat, harassment, suspension, demotion, discrimination or dismissal) against people who collaborate in investigations where the breach of any provision established in this Policy and/or in the other Genomma policies is presumed.

### False accusations

We recognize that false accusations can have serious effects on innocent people. If, after investigation, it is found that the Complainant made a false accusation, the Complainant will be subject to the appropriate penalties.

## Standards

This Policy establishes Genomma's minimum standards to address and prevent bullying and harassment. Additional policies related to harassment, discrimination, bullying or workplace violence may be implemented with respect to the countries where Genomma operates, but only to the extent that they do not contravene the provisions of this Policy.

The rules established in this policy are auxiliary and internal, so any Genomma collaborator can file a formal complaint with the corresponding authority as the case may be. Resorting to Genomma's complaint procedure does not prevent collaborators from filing a complaint with said authorities.

The content of this Policy does not contravene or operate in derogation, substitution or detriment of any regulatory framework, or of any other right or prerogative that any collaborator has under the applicable laws.

## Knowledge and Acceptance of the Policy

All collaborators must know Genomma's Policy for the Prevention and Attention of Workplace Harassment, in order to promote, understand and apply this Policy, they will carry out training and information campaigns.

This declaration is aligned with our Code of Conduct and Ethics, and will be reviewed annually and communicated to all members of the organization.



**Jorge Luis Brake Valderrama**  
**CEO**  
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