

Total Respect Policy



Total Respect Policy

1. Purpose:

The objective of this policy is to encourage a respectful work environment, which promotes interactions, as well as personal and professional development, while valuing differences, and promoting collaboration amongst all of us who are part of Arca Continental (AC). This will allow us to strengthen our cultural principle of People Focus, to the level of excellence that we achieve our results.

2. Scope:

This policy is applicable to all associates of AC, its subsidiaries and business units of all countries and regions where AC operates. This also applies to all third parties and the applicable interactions generated with any member of the value chain, inside or outside our facilities.

3. Definitions and abbreviations:

Respect: In AC, we define Respect as recognizing the dignity of people, understanding, and valuing our differences, living by our cultural principles, and communicating in a professional manner to all associates, regardless of job level or title.

4. Policy Guidelines:

4.1 Principles

The general principles that apply to this policy are:

- i) To promote respect and professionalism in AC in accordance with our Cultural Principles.
- ii) To maintain a work environment free of disrespectful, discriminatory, harassing, offensive, violent or exclusionary behavior.
- iii) To act in accordance with the procedures defined in dealing with complaints and define the actions that correspond in each case.
- iv) To provide the necessary assistance to our associates.

4.2 Leader's Roles and Responsibilities

The roles and responsibilities to assume are as follows:

- Know this policy and participate with their team in any necessary training to promote awareness.
- Be aware of their own behaviors and detect where self-improvement is needed. They must also be aware of any associate's behaviors that violate the principles of this policy.
- Act with transparency and respect in maintaining effective communication and active listening.

Total Respect Policy

- Lead by example, build trust, give continuous feedback, value time and be consistent with our principles and values.
- Do not abuse your position as a leader or allow acts of disrespect and/or threaten.
- Promptly report potential violations of this policy, whether they see it directly or it is reported to them.

4.3 Behaviors to promote

At AC, we promote respectful behaviors and practices that strengthen our culture. Toward that end, it is expected from all leaders and associates to:

- Communicate in a professional way: use an appropriate language and tone to share ideas, generate trust in our conversations so that the other persons can express themselves freely, respect the time of others, listen actively and interact with everyone in the same manner.
- Recognize the dignity of each person: this means recognizing and accepting everyone as a unique individual.
- Understand our differences and valuing them: this means accepting and acknowledging differences in other people. As a company that operates in different countries, it is key to always be aware of our cultural differences.
- Act in accordance with our principles and values: it means acting in line with our AC cultural principles.

4.4 Behavioral Awareness

Cultural norms are constantly evolving and changing, what in previous years was considered relatively accepted or tolerated can now be seen as offensive or inappropriate, so it is necessary to be aware of these changes.

Likewise, the perception of others is very important, and we have to be sensitive in identifying if discomfort arises with another person in connection with a particular behavior and not repeat that behavior.

For this reason, all leaders and associates are expected to:

- Be mindful of our actions, expressions, gestures, and the language we use when interacting with others.
- Be aware of all interactions in our workplace and work-related events, especially when providing feedback.
- Take special care of your use of humor and how we physically approach others.

To support this awareness purpose, AC will generate different communication and training processes.

Total Respect Policy

4.5 Prohibited Behaviors

At AC, we prohibit disrespectful behaviors of any kind since they are a violation to this policy and corrective actions will be applied as provided below.

Among disrespectful behaviors, are considered, but not limited to the following: physical violence, insults, humiliation and other verbal aggressions, threats or retaliation and requests to perform illegal or unethical acts, and other similar behaviors or that could cause similar effects.

i. Prohibition against Workplace Harassment, Including Sexual Harassment

In AC, all harassment is prohibited. Harassment can be any single incident or pattern of behavior where the effect, intentional or unintentional, creates a hostile, offensive, or intimidating work environment based on any of the classifications noted in the “Prohibition of Discrimination” section set forth below.

AC also prohibits any harassing behaviors based on an individual's sex, gender identity, or gender expression, regardless of the harasser's sex or gender. Such behaviors include, but are not limited to: sexual assault, “quid pro quo” or coercion to perform sexual acts, inappropriate touching, inappropriate messages or images of sexual content, derogatory comments based on sexual preferences or sexist comments, retaliation for refusal of a sexual proposal, cover-up of sexual harassment, frequent non-consensual insinuations or invitations, inappropriate compliments or inappropriate criticism about the physical appearance of the other, these behaviors do not exclude others, which could be similar or with similar effects.

In the execution of our jobs, our conduct must always be kept professional, regardless of any personal relationships that may exist between associates.

ii. Prohibition against Discrimination

AC is committed to maintaining a work environment free from all forms of unlawful discrimination. It is AC's policy to prohibit discrimination and harassment against any applicant, employee, vendor, contractor, customer, or client on the basis of race, color, religion, sex or gender, national origin, ancestry, age, mental or physical disability, medical condition, pregnancy, military or veteran status, genetic information, citizenship status, marital status, sexual orientation, gender identity and/or gender expression, or any other reason prohibited by law.

4.6 Prohibition against Retaliation

AC prohibits retaliation in any form, against the person who files a report for any act of disrespect contained in this Policy, whether on their own behalf or on behalf of a third-party.

Retaliation constitutes a serious violation of this Policy. Anyone who violates this Policy is subject to corrective action, up to and including termination of employment, appropriate under the circumstances, in conformance with applicable laws.

4.7 Associates Intervention for Prevention

Total Respect Policy

In AC, we seek that all associates take an active role when they witness an act of disrespect, with the purpose of correcting the situation at the time it occurs, avoiding possible subsequent negative effects, generating learning that helps us so that the situation is not repeated, and being empathetic with the affected person. AC encourages all of us to actively fulfill this role.

4.8 Speak up

Any associate who becomes aware of or witnesses a behavior contrary to this Policy, must take immediate action by reporting the fact to their supervisor, Human Resources or via the Transparency Mailbox which also allows for anonymous reporting.

If the report is made to a supervisor or a member of the human resource team, they must incorporate the details of the report into the Transparency Mailbox.

AC expects the reports to include all necessary information and a description of the relevant facts, to allow the appropriate investigation. (*)

(*) This provision is applicable to our United States operations only.

4.9 Investigation Process

The investigation processes, penalties and consequences are under the responsibility of the local ethics committee and Human Resources department of the respective country.

All associates are expected to cooperate fully in any investigation. In general, information gathered under any such investigation will be maintained in a manner that respects confidentiality, to the extent possible and complies with all applicable company policies and laws.

4.10 Country Specific Requirements

AC will abide by any countries' applicable policies, laws, and regulations related to the enforcement of discrimination or harassment in the workplace.

5. Vigilance, Compliance with, and Interpretation of the Policy:

The Human Capital and Legal Executive Directorates must closely monitor the broadcasting of and compliance with this policy, in collaboration with the other Executive Directorates and the General Directorate. The Ethics Committees of each country are responsible for investigating and deciding on any conduct detected or reported as harassment of any kind.

All associates must:

- Know and apply this policy.
- Avoid any disrespectful behaviors.
- Promptly report potential violations of this policy via the available channels.

Total Respect Policy

6. Consequences or Sanctions for Lack of Compliance with the Policy:

Anyone who violates this Policy is subject to corrective action, up to and including termination of employment, appropriate under the circumstances, in conformance with applicable laws. This corrective action will be proportional to the seriousness of the behavior and may include training aimed at re-education.

Changes Log POL-GG-CHU-TTO-002:

Issue date:	July 25, 2023
Date of application:	July 25, 2023
Date of last update:	May 1, 2025
Initial effective date of the update:	May 1, 2025
Directorate responsible for the issue or update:	Talent Directorate

Any associate who reasonably suspects or becomes aware of conduct that deviates from this policy is encouraged to make a complaint to any manager or by any other means, including the Transparency Mailbox, through the following options:

1. The “Transparency Mailbox” on the corporate intranet or on the Arca Continental web page <https://www.buzondetransparenciaac.com/>
2. The toll-free phone lines:
 - In Argentina: 0800-345-2036
 - In Ecuador: 1-800-001-684
 - In the USA: 1-833-761-8291
 - In Mexico: 800-880-0754
 - In Peru: 0800-74684