



Workplace Violence, Harassment and Discrimination Prevention policy

1. Introduction

At Vista, we recognize the importance of protecting and promoting fundamental human rights across our operations, extending such commitment to all third parties who operate with us. In accordance with International Labour Organization Convention No. 190, we understand that violence, harassment and discrimination in the workplace constitute a human rights violation or abuse, and a threat to equal opportunities; we therefore uphold a **zero-tolerance** policy towards violence in the workplace.

It is prohibited, for anybody working at Vista to participate in any act that may result in another person feeling threatened or unsafe. Such acts include, but are not limited to, verbal abuse, threats and any expression of hostility, intimidation, or aggression.

We also seek to promote a **work environment that is free from all types of violence, harassment and discrimination**, and/or from any other offensive or disrespectful behavior towards anyone who is part of Vista, understanding that women, other gender identities and other socially vulnerable groups are the ones most exposed to these violations.

2. Purpose

According to our Code of Ethics and Conduct guidelines, this Policy establishes Vista's commitment to provide a healthy work environment, to prevent violent, harassing, or discriminatory behavior in the workplace, and to take appropriate action in case it occurs.

3. Responsibilities

Vista and the people who are part of it are responsible for creating, maintaining and guaranteeing a work environment that is free from violence, harassment and discrimination, where everyone can carry out their tasks and responsibilities.

Each member of Vista should be given the opportunity to achieve their highest potential and contribute to the Company's success in a healthy work environment. To this end, we should not engage in discriminatory conduct, or any action that could affect equal opportunity among Vista employees, nor tolerate this kind of behavior from third parties interacting with us.

We expect organizational leaders to promote a culture that is free from violence, harassment, and discrimination, and to communicate to their teams the resources available to them to

address these situations.

4. Impact

Violence, harassment and discrimination have a negative effect that not only impacts the recipient, but it also the team, the work environment, the organization and society as a whole.

5. Scope

This Policy applies to all Vista personnel and all employees working at companies that are part of the Vista Group, which conduct activities, operations or business anywhere around the world. It also applies to third parties, such as suppliers and contractors, who by providing regular or temporary services, occupy the same workspace as Vista employees.

6. Place of Enforcement

This Policy will be applied both when violence, harassment or discrimination situations take place inside Vista's facilities, and in any physical space where a work relationship takes place. It also applies to any work-related interactions that take place by telephone or virtual channels.

7. Definitions

ILO Convention 190 defines workplace violence and harassment as a *"range of unacceptable behaviors and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm, and includes gender-based violence and harassment."*

Different types of violence may occur at the workplace. Argentine legislation identifies from the most visible types of violence, such as physical assault to the more subtle forms such as psychological or symbolic violence. It is important to note that a violence occurrence may involve different kinds of violence, as they are not mutually exclusive but quite the opposite. Annex 1, attached to this policy, includes definitions of the different types of workplace violence.

8. Procedures

Any person who experiences or has knowledge and/or a sound suspicion of a violence, harassment and/or discrimination situation in the workplace may report it through the available channels provided by the organization, including their direct manager, HR Manager, Compliance Officer, Ethics Committee or the external Ethics Line, which is anonymous and confidential.

The receiving team will immediately and exhaustively analyze the consultation in a confidential manner. They will make recommendations based on their analysis and the following criteria. If

the consultation is considered to be serious, the guidelines detailed in the Procedures for Internal Investigation of Breaches to the Code of Ethics and Conduct will apply. If, on the other hand, the consultation is not considered to be serious, preventive, educational and/or reparation measures will be assessed pursuant to related Policies and the Company's Code of Ethics and Conduct.

9. Reinforcement Actions

Training and awareness actions

Current Policy enforcement will be accompanied by awareness campaigns about workplace violence issues, directed to all employees, especially Ethics Committee members. Vista commits to provide all personnel with annual updates, in regard to these issues.

Record system

Always with the intention of fostering a healthy work environment and vigilant of confidentiality issues, a record of all consultations received will be kept, including, among other relevant parameters: location, area, gender and reporting channel.

10. Whistleblower Protection Policy

Vista has a Policy to protect whistleblowers against retaliation, that prohibits any kind of retaliation against employees that in good faith inform, consult on or report cases of violence, harassment or discrimination.

11. Related Documents:

Code of Ethics and Conduct, Procedure for Conducting an Internal Investigation of Breaches to the Code of Ethics and Conduct, Policy of Conduct and Corrective Actions, and Whistleblower Protection against Retaliation Policy.

ANNEX 1

Definition of the different kinds of workplace violence:

- **Physical violence:** any behavior, directly or indirectly aimed at causing physical harm or suffering, to any person employed by the Company.
- **Psychological violence:** any behavior causing emotional damage and undermining self-esteem, or affecting and disrupting full personal development, or seeking to degrade or control another person's actions, behaviors, beliefs or decisions by means of threats, harassment, bullying, restriction, humiliation, shame, defamation, manipulation, or isolation. Such behavior also includes blaming, stalking, demands of obedience and submission, verbal coercion, persecuting, insulting, ostracizing, being indifferent to, abandoning, having excessive jealousy, extortion, ridicule, exploitation, and restrictions to an individual's right to freedom of movement within or access to the workplace, as well as any other conduct resulting in damage to another person's mental health or self-determination.
- **Economic violence:** actions aimed at undermining economic resources. This could take place through: a) the disturbance of possession, holding or ownership of assets; b) loss, theft, destruction, withholding, misappropriation of objects, work tools, personal documents, assets, securities or proprietary rights; c) income limitation or control, including lower pay for work of equal value in the same workplace, including lower pay for work of equal value in the same workplace (**wage inequality**).
- **Symbolic violence:** violence that, through stereotyped patterns, messages, values, icons or signs, transmits and reproduces domination, inequality and discrimination in social relationships, legitimizing subordination of one group to another as natural in our society.
- **Sexual harassment:** any kind of conduct or comment with sexual connotations that does not have the consent of the recipient.
- **Harassment/bullying:** persistent and repeated actions to inconvenience an employee, manifest in behavior, words, acts, gestures and writings that may undermine their character, dignity or their physical or mental integrity, or that may jeopardize their employment, or degrade the work environment on the basis of gender, sexual orientation, age, nationality, ethnicity, skin color, religion, marital status, disabilities, physical conformation, artistic, cultural or sports preferences, family situation or position in the hierarchy.
- **Cyberbullying:** digital harassment against a person or group through such media as e-mails, social networks, blogs, instant messaging, mobile phones and websites.

- **Discrimination:** any of the following actions: a) to create and/or collaborate in disseminating stereotypes for any group of people, based on real or imaginary attributes, regardless of the type of attribute, whether they are positive or negative, related to innate or acquired conditions; b) to harass, mistreat, isolate, attack, segregate, exclude and/or marginalize any member of a group of people, of any kind, on account of their belonging to such a group, and c) to establish any legal, economic or labor restrictions; or any limitations to freedom of movement or access to specific areas within the workplace, or to health or educational service provision, to a member of a group of people of any kind, with the effect or intention to undermine or invalidate the recognition, enjoyment or exercise of human rights or essential liberties.
- **Gender-based violence:** structural practice that violates fundamental human rights and liberties, seriously affecting women and members of the LGBTI+ community. It occurs when any kind of discrimination, attack, harassment or degradation is directed at a person, on the basis of their gender identity, gender expression or sexual orientation. It consists of any conduct (an action, insult, attitude, silence or absence of collaboration) that causes harm to a person only for being a woman or LGBTI+ person.

ANNEX 2

Aggravating circumstances in workplace violence occurrences

Below we detail situations that constitute aggravating circumstances in certain situations:

- In relation to the recipient of violence:
 - If they belong to a socially vulnerable group.

- In relation to the people exerting violence:
 - If they are in a position of power
 - If they have a supervisory role
 - If they are the claimant's direct manager
 - If they fail to collaborate with the investigation
 - If they fail to understand why the behavior reported is an act of violence

- In relation to the behavior reported:
 - If it is a physical and/or sexual assault
 - If it happened repeatedly, and/or
 - If it extended outside the work environment

- If once an event takes place or is reported, the accused person threatens the affected party to make them cease or withdraw the claim.

Rev.1

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