

# CTA-CONTINENTAL ANTI-HARASSMENT AND ANTI-DISCRIMINATION POLICY



## PURPOSE

This Policy establishes guidelines for the prevention, identification, and response to any form of harassment, intimidation, or discrimination in the workplace, ensuring professional relationships based on respect, dignity, and personal integrity.



## SCOPE

This Policy applies to:

- All employees, regardless of employment status or hierarchical level;
- Officers, managers, and administrators;
- Third parties, suppliers, service providers, and business partners;
- Any individuals who interact with the Company.

This Policy applies to all environments related to the employment relationship, including:

- The Company's physical facilities;
- External environments associated with professional activities (meetings, events, training sessions, and business travel);
- Virtual environments and corporate communication channels (emails, digital platforms, internal networks, and messaging applications).



## GUIDING PRINCIPLES

The Company conducts its activities in accordance with the following principles:

- Respect for human dignity;
- Promotion of a safe and inclusive work environment;
- Equal treatment and equal opportunities;
- Zero tolerance for abusive or discriminatory practices;
- Confidentiality and protection of reporting individuals.



## DEFINITIONS

For purposes of this Policy, the following definitions apply:

### HARASSMENT

Any abusive conduct, whether repeated or not, that has the purpose or effect of violating an individual's dignity by creating an intimidating, hostile, degrading, or offensive environment, including, but not limited to:

- Moral harassment;
- Sexual harassment;
- Psychological, physical, verbal, or economic harassment.

### POLITICAL/ELECTORAL HARASSMENT

Any form of imposition, inducement, pressure, intimidation, or persecution related to

political, ideological, or electoral positions, including:

- Requests for support of candidates, political parties, or campaigns;
- Coercion to participate in political demonstrations or activities;
- Discrimination based on political orientation.



## PREVENTION AND RESPONSE GUIDELINES

The Company shall adopt ongoing measures to prevent and address harassment and discrimination, including:

- Clear and accessible communication of this Policy;
- Periodic training and awareness initiatives;
- Availability of secure reporting channels;
- Diligent and impartial investigation of reported incidents;
- Implementation of corrective and disciplinary measures;
- Continuous monitoring of the organizational environment;
- Mandatory periodic training, as provided in this Policy.



## RULES OF CONDUCT

The following rules are mandatory and apply at all hierarchical levels.

### PROHIBITED CONDUCT

- Engaging in any form of harassment or abusive behavior;
- Intimidating, humiliating, threatening, or coercing colleagues;
- Discriminating for any reason, including personal, social, union-related, or political circumstances;

- Inducing or pressuring colleagues to engage in political or electoral activities;
- Using corporate channels to disseminate offensive or inappropriate content.

## EXPECTED CONDUCT

- Maintain a respectful and professional work environment;
- Act with courtesy and cooperation in workplace relationships;
- Respect diversity of opinions without imposing personal beliefs;
- Ensure the proper use of the Company's physical and digital environments.

## MANAGEMENT RESPONSIBILITIES

- Prevent risk situations within their teams;
- Act promptly upon receiving complaints or identifying indications;
- Ensure a safe environment free from retaliation;
- Promote an ethical and respectful organizational culture.



## TRAINING AND AWARENESS

The Company shall provide mandatory annual training on the prevention of and response to harassment and discrimination, including political/electoral harassment, to all employees regardless of hierarchical level.

Participation in such training constitutes an employment-related obligation, and unjustified failure to participate may result in appropriate disciplinary measures.



## REPORTING CHANNELS AND COMPLAINT HANDLING

Any employee who considers himself or herself a victim or witness of abusive conduct must report the matter through the Company's official reporting channels, especially the COMPLAINTS OFFICE, operated by the People and Sustainability Department and the Legal and Compliance Department, with confidentiality guaranteed.

The Complaints Office ensures:

- Availability of accessible, secure, and widely publicized reporting channels;
- The possibility of identified or anonymous reports;
- Protection of good-faith reporting individuals against any form of retaliation;
- Impartial, confidential, and diligent handling of information;
- Monitoring of reports through completion, as applicable.

Available reporting channels include, among others:

- In-person reporting through the responsible departments;
- The internal printed "Incident Report" form, available throughout the Company;
- The institutional Complaints Office email address;
- The outsourced ethics reporting service (Contato Seguro), accessible through an online platform, toll-free telephone number, mobile application, and digital channels.

The Company may also direct individuals to official external reporting channels when appropriate.

Reports shall be:

- Properly registered;
- Reviewed impartially;
- Treated confidentially;
- Monitored through resolution.



## DISCIPLINARY MEASURES

Engaging in prohibited conduct shall result in the application of appropriate disciplinary measures, which may include:

- Warning;
- Suspension;
- Termination for cause, where applicable;
- Any other applicable legal measures.



## GUARANTEE OF RIGHTS

The Company:

- Respects freedom of association and collective bargaining rights;
- Ensures the right to individual political participation, provided that such participation does not result in improper interference or intimidation within the workplace;
- Rejects any form of retaliation against good-faith reporting individuals.



## FINAL PROVISIONS

This Policy must be observed by all individuals and entities within its scope.

Any questions regarding this Policy should be directed to the area responsible for corporate ethics.

This Policy shall be reviewed periodically to ensure that it remains current and aligned with legal requirements and institutional guidelines.

**This version of the Policy is dated June 10, 2026.**

