

WORKPLACE HARASSMENT AND SEXUAL HARASSMENT PREVENTION AND RESPONSE PROTOCOL

PARAMEK SA

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*Legal Framework: Law No. 18.561 (Sexual Harassment) | Law No. 17.940 | Labor Code
Decree 256/009 | ILO Convention No. 190 | Uruguayan Occupational Health Standards*

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2. OBJECTIVES

This Protocol aims to:

- Prevent and eradicate all forms of workplace and sexual harassment within the company.
- Establish a clear, confidential and impartial procedure for receiving, investigating and resolving complaints.
- Protect complainants and witnesses from retaliation.
- Comply with applicable Uruguayan legislation, in particular Law No. 18.561 and its regulatory decrees.
- Promote a work environment based on respect, dignity and equal treatment.

3. SCOPE OF APPLICATION

This protocol is mandatory for:

- All company employees, regardless of position, seniority or type of contract.
- Interns, trainees and staff contracted through third parties who provide services at company premises.
- Suppliers, clients and visitors, with respect to conduct exercised within the company's facilities.

The protocol applies to situations occurring at the workplace, in work-related activities, in digital or telephone communications of a professional nature, and during travel or trips related to company activities.

4. DEFINITIONS

4.1. Workplace Harassment (Mobbing)

Workplace harassment is defined as any repeated and systematic behavior, action or omission carried out by one or more persons against another, within the scope of an employment relationship, with the purpose or effect of undermining the dignity, physical or psychological integrity of the affected person, or creating an intimidating, hostile, humiliating or offensive work environment.

It includes, among other behaviors:

- Repeated public criticism and humiliation.
- Assignment of degrading tasks or tasks clearly below the employee's capabilities.
- Social or communicative isolation.
- Excessive and unjustified workload.
- Threats, insults or belittling remarks.

4.2. Sexual Harassment

Pursuant to Law No. 18.561, sexual harassment is defined as any conduct of a sexual nature carried out by a person that affects the dignity of another person at work, when such conduct is unwanted, unreasonable and offensive to the recipient, or when rejection or acceptance of such conduct influences decisions affecting that person in the workplace.

It may manifest as:

- Quid pro quo harassment: conditioning employment benefits on sexual favors.
- Hostile environment harassment: verbal, physical or visual conduct of a sexual nature that creates a hostile or offensive work environment.

4.3. Retaliation

Any adverse action taken against a person who has filed a good-faith complaint, participated in an investigation or rejected harassing behavior. Retaliation includes unfavorable changes to employment conditions, dismissal, salary reduction, unjustified transfer or any act of harassment following a complaint.

5. GUIDING PRINCIPLES

Dignity: Every person has the right to be treated with respect and to work in an environment free from violence and harassment.

Equality and Non-Discrimination: The protocol applies without distinction of gender, sexual orientation, nationality, age, religion, disability or any other condition.

Confidentiality: The identity of the parties and the content of the proceedings are strictly confidential.

Impartiality: The investigation is conducted objectively, without bias towards any party.

Presumption of Innocence: The accused person is presumed innocent until the investigation establishes otherwise.

Timeliness: Procedures are processed within established timeframes, without unjustified delays.

Non-Retaliation: Any retaliation against a good-faith complainant or investigation participant is prohibited.

Gender Perspective: A gender lens is applied in analyzing the facts, in accordance with international standards.

6. PROHIBITED CONDUCT

The following are expressly prohibited within the company:

1. Any conduct constituting workplace or sexual harassment as defined in Section 4.
2. Any unwanted physical contact of any nature.

3. Making comments, jokes, insinuations or proposals of a sexual nature.
4. Sharing images, videos, memes or messages of a sexual or humiliating nature through any channel, including digital media and messaging groups.
5. Threatening, intimidating or pressuring a person due to their rejection of harassing behavior.
6. Retaliating against complainants or witnesses.
7. Filing bad-faith complaints with the intent to harm a colleague.
8. Obstructing, interfering with or attempting to improperly influence the investigation process.

7. RESPONSIBILITIES

7.1. Senior Management

- Approve and promote this protocol.
- Allocate the necessary resources for its implementation.
- Ensure that all complaints received are investigated.
- Enforce the established sanctions.

7.2. Human Resources Department

- Administer and update the protocol.
- Receive and process complaints.
- Appoint the investigation team.
- Ensure confidentiality throughout the process.
- Maintain case records and follow-up.
- Coordinate training activities.

7.3. Supervisors and Line Managers

- Actively foster an environment of respect.
- Report to HR any harassment situation they become aware of, even if it is not a formal complaint.
- Refrain from taking disciplinary action independently upon receiving complaints; always refer to HR.
- Never be part of the investigation team in cases involving their direct team.

7.4. All Staff

- Know and comply with this protocol.
- Maintain respectful conduct toward colleagues.
- Cooperate with investigations when called upon.
- Report harassment situations they witness.

8. REPORTING CHANNELS

Complaints may be filed through the following channels:

Channel	Recipient	Availability
In-person complaint	HR / Protocol Officer	Monday to Friday, business hours
Confidential email	protocol@paramek.com	24 hours a day
Anonymous physical mailbox	Located at reception / break room	24 hours a day
External channel (MTSS)	Ministry of Labor and Social Security	www.mtss.gub.uy

Complaints may be identified or anonymous. In the case of anonymous complaints, the company will investigate to the extent that the information provided allows.

9. INVESTIGATION PROCEDURE

9.1. Receipt of Complaint

Upon receiving a complaint, HR must:

9. Immediately record it in the intake form (Annex I), noting the date, time, reported facts, parties involved and evidence mentioned.
10. Notify Management within 24 business hours.
11. Inform the complainant about the procedure, their rights and the available protective measures.
12. Assess whether immediate precautionary measures are required (see Section 10).

9.2. Appointment of the Investigation Team

Within 3 business days of receiving the complaint, an investigation team of at least two people will be appointed who must meet the following requirements:

- No personal or direct hierarchical relationship with any party.
- No conflict of interest with the case.
- Training in harassment matters and gender perspective.

The company may engage an external investigator when circumstances warrant (e.g., when the complaint involves management-level staff).

9.3. Investigation Timeline

Stage	Maximum Timeframe
Receipt and registration of complaint	24 business hours
Appointment of investigation team	3 business days
Notification to the accused party	5 business days from complaint
Investigation period (interviews, evidence)	20 business days
Issuance of final report	30 business days from complaint
Decision and communication to parties	5 business days from report
Total maximum process duration	35 business days

9.4. Conducting the Investigation

The investigation team must:

13. Formally notify the accused person of the alleged facts, guaranteeing their right to be heard.
14. Interview the complainant, the accused and identified witnesses separately.
15. Collect and analyze all relevant evidence: digital communications, access records, security cameras, documents, etc.
16. Maintain strict confidentiality throughout the process.
17. Document each action with a signed record.
18. Produce a well-founded final report with conclusions and recommendations.

9.5. Final Report

The final report must contain:

- Description of the reported facts.
- Summary of actions taken (interviews conducted, evidence analyzed).
- Analysis of facts in light of the protocol definitions.
- Conclusion: whether conduct constituting harassment has been established or not.
- Recommendations for sanctions and/or corrective measures.

10. PRECAUTIONARY MEASURES

From the moment a complaint is received and throughout the investigation, the company may adopt precautionary measures, which do not imply prejudgment, in order to protect the parties and safeguard the process. These may include:

- Physical or functional separation between the complainant and the accused (shift change, reassignment to a different area or location).

- Temporary suspension with pay of the accused person, in cases of particular gravity.
- Restriction of access to certain areas or systems.
- Prohibition of direct communication between parties during the process.
- Assignment of a support contact for the complainant.

IMPORTANT: Precautionary measures are temporary and preventive in nature. They do not constitute a sanction or imply an admission of liability.

11. SANCTIONS

Once the investigation is concluded, if workplace or sexual harassment is established, the company will apply sanctions proportional to the severity of the conduct. Sanctions may include:

Severity	Examples of Conduct	Possible Sanction
Minor	Isolated inappropriate comments, tasteless jokes without recurrence.	Written warning. Mandatory training.
Moderate	Repeated verbal harassment, sexual insinuations, systematic exclusion.	Unpaid suspension (up to 5 days). Reassignment of duties.
Serious	Physical harassment, sexual harassment involving contact, systematic harassment with documented psychological harm.	Dismissal for serious misconduct (without severance pay), pursuant to Article 31 of Law No. 10.489.

The company may also report the facts to the General Labor and Social Security Inspectorate (IGTSS) or to the competent police or judicial authorities, where the facts may constitute criminal offenses.

Bad-faith complaint: anyone who files a complaint knowing it to be false, with the intent to harm a third party, will also be subject to disciplinary action.

12. PROTECTION OF THE COMPLAINANT

The company guarantees the complainant:

- Protection against any form of retaliation, direct or indirect, during and after the process.
- The right to be informed of the status and outcome of the process, to the extent that confidentiality permits.
- Access to psychological support or counseling during the process.

- The maintenance of their employment conditions, unless a voluntary change is agreed upon for their protection.
- That any retaliation exercised against them will be treated as a new disciplinary offense.

13. CONFIDENTIALITY

Any person who becomes aware of a complaint or participates in the investigation process is obligated to maintain strict confidentiality regarding the identity of the parties and the content of the proceedings.

Breach of the duty of confidentiality constitutes a serious offense and may result in disciplinary sanctions, independently of any civil or criminal liability that may apply.

Information from the process may only be communicated to third parties when required by a competent authority (MTSS, courts, etc.).

14. TRAINING AND COMMUNICATION

14.1. Protocol Distribution

- This protocol will be provided to all staff upon joining the company, as part of the onboarding process.
- It will be published on the company intranet and on notice boards in visible locations.
- All employees will sign an acknowledgment confirming they have received and read the protocol (Annex III).

14.2. Training

- At least one mandatory annual training session will be held for all staff on the prevention of workplace and sexual harassment.
- Staff with supervisory responsibilities and HR personnel will receive additional training on complaint management and gender perspective.
- Attendance records will be kept for all training sessions.

15. RECORDS AND DOCUMENTATION

HR will maintain a confidential file for each case, including:

- Complaint intake form.
- Interview records.
- Collected evidence.
- Final investigation report.
- Company decision and sanctions applied.

- Post-resolution follow-up.

Files will be retained for a minimum of 5 years in a secure, restricted-access location, in compliance with Law No. 18.331 on Personal Data Protection.

16. PROTOCOL REVIEW

This protocol will be reviewed:

- At least annually.
- Whenever relevant regulatory changes occur.
- When deficiencies in its application are identified.

The review will be led by HR with participation of Management and, where appropriate, employee representatives.

17. ANNEXES

ANNEX III — PROTOCOL ACKNOWLEDGMENT FORM

I, the undersigned:

Full name: _____

ID No.: _____ Position: _____

Department: _____ Start date: _____

Hereby declare that I have received, read and understood the Workplace Harassment and Sexual Harassment Prevention and Response Protocol of [COMPANY NAME], in its current version.

I commit to complying with its provisions and to contributing to the creation of a work environment based on respect and dignity.

Signature: _____ Date: _____

_____ Full name: _____

ANNEX IV — APPLICABLE LEGAL FRAMEWORK

Regulation	Relevance
Law No. 18.561 (2009)	Prevention and punishment of sexual harassment in the workplace and in teacher-student relationships.
Decree No. 256/009	Regulatory decree for Law No. 18.561.
Law No. 17.940 (2006)	Trade union freedom and worker protection.
Law No. 18.331 (2008)	Personal data protection and habeas data proceedings.
Law No. 19.580 (2017)	Gender-based violence against women.
ILO Convention No. 190 (2019)	Elimination of violence and harassment in the world of work (ratified by Uruguay).
Uruguayan Labor Code	General employer obligations regarding safe working environments.
Decree-Law No. 14.791	Working hours and employment conditions.