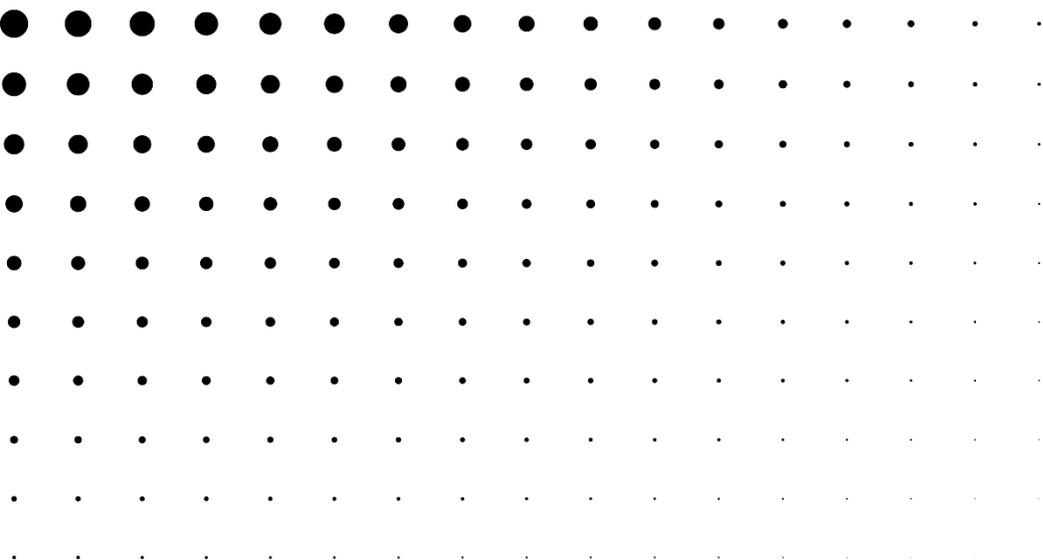


# ANDINO

Global

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# HARASSMENT PREVENTION AND RESPONSE PROTOCOL



## **HARASSMENT PREVENTION AND RESPONSE PROTOCOL**

### **Approved by the Board of Directors – 2025 Version**

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#### **Purpose and Objective**

This Protocol establishes preventive measures, response procedures, and safeguards to prevent, address, and sanction any form of workplace harassment, sexual harassment, or harassment on grounds of sex within Andino Inversiones Global S.A. and its group of companies. Its purpose is to promote a working environment based on respect, dignity, and equality, free from hostile, discriminatory, or intimidating conduct.

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#### **Scope of Application**

This Protocol is mandatory for all personnel of Andino Inversiones Global S.A. in Spain, including executives, employees, contractors, and collaborators. It is also recommended for adoption by Andino Group subsidiaries in Peru and Mexico, adapted to local regulations, as part of the Group's global well-being, equality, and compliance (ESG) policies.

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#### **Regulatory Framework**

This Protocol is aligned with, among others, the following regulations and standards:

- Organic Law 3/2007 on the effective equality of women and men.
  - Royal Decree 901/2020 on equality plans and their registration.
  - Law 31/1995 on Occupational Risk Prevention.
  - Technical Criterion 69/2009 of the Labour Inspectorate.
  - Spanish Criminal Code (Articles 173.1 and 184).
  - ILO Conventions Nos. 100, 111, and 190.
  - OECD Principles and the 2030 Agenda (SDGs 5, 8, and 10).
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#### **Definitions**

For the purposes of this Protocol:

- **Sexual harassment:** any verbal or physical conduct of a sexual nature that has the purpose or effect of violating a person's dignity, creating an intimidating, degrading, or humiliating environment.
  - **Harassment on grounds of sex:** conduct related to a person's sex with the same purpose or effect.
  - **Workplace or psychological harassment (mobbing):** abusive conduct that is repeated and prolonged over time, involving psychological or professional harassment of an individual in the workplace.
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### **Principles of Action**

The implementation of this Protocol shall be guided by the following principles:

- Impartiality and objectivity in the handling of complaints.
  - Non-retaliation: protection against any adverse consequences for reporting harassment.
  - Absolute respect for the dignity, privacy, and confidentiality of all parties involved.
  - Promptness, effectiveness, and proportionality in actions taken.
  - Zero tolerance toward any form of harassment.
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### **Responsibilities**

The Board of Directors of Andino Inversiones Global S.A. is the highest body responsible for approving and overseeing this Protocol. The Compliance Officer in charge of the Whistleblowing Channel and the Human Resources Department shall manage reports and coordinate preventive and training measures. All employees are required to cooperate and report any harassment situation of which they become aware.

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### **Response Procedure**

#### **Informal Procedure**

Where the affected person considers the situation not to be serious, they may report it verbally or in writing to the Head or Manager of Human Resources or their direct supervisor, seeking a swift and confidential resolution through mediation.

## **Formal Procedure**

If the situation persists or is serious, a formal complaint shall be submitted and assessed through the Whistleblowing Channel or the designated body. An internal investigation shall be conducted, ensuring confidentiality, the presumption of innocence, and protection of all parties involved.

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## **Safeguards for the Parties**

- Confidentiality of all information and documentation.
  - Protection against retaliation or adverse consequences.
  - Right to trade union assistance or external advisory support.
  - Immediate communication of precautionary measures where necessary.
  - Right to be informed of the outcome of the procedure.
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## **Timeframes and Resolution**

Except in exceptional cases, the investigation procedure shall be resolved within a maximum period of 30 business days from receipt of the complaint. The Compliance Officer shall prepare a final report with conclusions and proposed disciplinary or preventive measures, which shall be submitted to the Ethics Committee. The Ethics Committee shall inform Senior Management or the General Management.

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## **Disciplinary Measures**

Verified harassment conduct shall be sanctioned in accordance with the severity of the facts and applicable labor legislation. Sanctions may include warnings, suspension without pay, or disciplinary dismissal, without prejudice to any civil or criminal liabilities that may arise.

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## **Training, Awareness, and Communication**

The Andino Group shall conduct annual training and awareness campaigns on workplace and sexual harassment, ensuring that all personnel are aware of preventive measures, reporting channels, and the content of this Protocol. This document shall be published on the corporate intranet and made available at all workplaces.

## **XII. Article 11. Regulatory Application and International Complementarity**

Andino Inversiones Global S.A. and the companies comprising its Group shall act in accordance with the national legislation in force in each country where they operate, particularly in matters relating to human rights, labor law, and social security.

Where national regulations establish specific procedures, deadlines, or mechanisms relating to human rights or labor relations, such provisions shall take precedence.

However, in countries or situations where applicable legislation does not provide sufficient procedures or standards, the principles and guidelines set forth in this Protocol shall apply, in accordance with internationally recognized frameworks established by the United Nations, the ILO, and the OECD.

In the event of discrepancies, the provision or standard offering the greatest protection to individuals and fundamental rights shall prevail.

The Group ESG and Compliance Committee shall be responsible for overseeing the consistency and adequacy of this Protocol with local legislation and for updating it when relevant regulatory changes occur.

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## **Approval and Entry into Force**

This Protocol has been approved by the Board of Directors of Andino Inversiones Global S.A. and enters into force on the date of its approval. It is mandatory in Spain and recommended for application by international subsidiaries.