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Anti-harassment Policy

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<b>Responsible for the Change</b>	<b>Responsible for the Review</b>	<b>Responsible for Approval</b>	
Function: Compliance Analyst Name: Natalia Caporici	Function: Financial Director Name: Gabrielly A. Nagy	Function: President Name: Frederico Samartini	Function: Compliance Officer Name: Vanderson Cavalcanti

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### 1. OBJECTIVE

Harassment is reproduced in the work environment rooted in a wider social, economic, organizational and cultural context of inequalities, mainly in relation to gender and race. In order to break this paradigm, it is necessary to create protection and information mechanisms in the work environment.

Yssy Company is committed to providing a work environment free from Sexual and Moral Harassment, Bullying and other forms of Unlawful Harassment. Harassment, in general, violates the spirit of equal opportunities and individual rights, deteriorates relationships and the work environment, and may even affect the commitment of the people involved with its activities, thus directly affecting the company.

This Anti-Harassment Policy aims to raise awareness and inform about the subject, as well as demonstrate situations of inappropriate conduct that will not be tolerated. Above all, disclose the directive procedures to be adopted in this type of situation, and the forms of prevention within the team.

Yssy will take allegations of Harassment seriously and will respond quickly and appropriately to this type of situation, for the well-being of all employees. In this way, the company believes that it will be able to promote a healthy, integral and collaborative work environment and culture in accordance with its values, mission and vision.

## **2. APPLICATION**

This policy is applicable to members of the Board, Chief Executive Officer, other directors, Superintendents, Managers, Coordinators, Supervisors, Employees, Job Candidates, Business Partners (suppliers, partners and third parties) and Customers.

## **3. CONCEPTS**

Yssy knows the consequences of Harassment in relation to the degradation of the professional environment. This policy came with the aim of raising awareness and informing. This topic will explain some specific and indispensable concepts in relation to the topic. In this way, Yssy understands that it will be able to promote a healthier and more upstanding work environment.

### **3.1. What is bullying?**

Moral harassment is characterized by gestures, words (oral or written), behaviors that expose the employee to humiliating, degrading and embarrassing situations, in a repetitive and prolonged way in the exercise of their activities. This attitude is




capable of causing offense to personality, dignity or psychic or physical integrity, endangering their employment or deteriorating the environment.<sup>1</sup>

It is a form of violence whose main objective is to emotionally and professionally destabilize the employee, and may occur through direct actions, such as: insults, screams, accusations and humiliation, and indirectly, such as: isolation, social exclusion, refusal to communicate, gossip and spread of rumors.<sup>2</sup> It is important to emphasize that the habituality of conduct and intentionality are essential to characterize this type of harassment.

It occurs mainly within the work environment, but it can be seen in other places, as long as it is related to the power relations developed in the professional sphere.

### 3.1.1. Types

Harassment manifests itself in three different ways:

- **Vertical:**  Occurs between people of different hierarchical levels, for example: bosses and subordinates. It may be a descendant, harassment practiced by the superior, taking advantage of his authority status to put the employee in uncomfortable situations. In addition to this, it can be the ascendant, harassment practiced by subordinates against the boss, causing embarrassment to the superior for different interests.
- **Horizontal:**  Occurs between people who belong to the same hierarchical level, that is, between co-workers without a subordinate relationship.
- **Mixed:**  Occurs when the employee is harassed by superiors and co-workers with whom he does not maintain a subordinate relationship.

<sup>1</sup> (Senado Federal – Assédio Moral e Sexual no Trabalho – Acesso: <https://www12.senado.leg.br/institucional/procuradoria/proc-publicacoes/cartilha-assedio-moral-e-sexual-no-trabalho>)

<sup>2</sup> (TST – Cartilha de Prevenção ao Assédio Moral – Pare e Repare – Acesso: <https://www.tst.jus.br/documents/10157/55951/Cartilha+ass%C3%A9dio+moral/573490e3-a2dd-a598-d2a7-6d492e4b2457>)

### 3.1.2. harasser and harassed

Anyone can practice moral harassment, both men and women, being characterized as the harasser. In addition, any person, both men and women, can suffer bullying or a group of people.

### 3.1.3. Difference between moral harassment and management acts

Moral harassment can be confused with acts of management, so it is important to define specifically, acts of management without a derogatory or discriminatory purpose do not characterize moral harassment, for example:

- Assign more tasks, that is, increased workload. It is normal to have periods of higher workload. Overloading can only be characterized as bullying if used to specifically disqualify an individual or if used as a form of punishment.
- Work demand, that is, demanding that work be carried out efficiently and encouraging the achievement of goals. It is natural to have definitions of tasks and achievement of goals already designed, as well as collections, as long as it is done in a professional way.
- Sporadic conflicts between colleagues and supervisors. Disagreements can occur in the exercise of the function, and mere conflict does not characterize moral harassment.
- Constructive criticism or evaluation of work carried out by colleagues or superiors, as long as they are not made in public and do not expose the employee.

It is important to keep in mind that there are more examples, but management acts are different from moral harassment, especially when they are linked to the company's interest, as long as they are reasonable.

### 3.1.4. Examples of Moral Harassment

We will put some examples of situations of moral harassment, so that they can be identified and understood. However, it is merely an example, there are other situations.

- ✓ Remove workers' functional autonomy or deprive them of access to work tools;
- ✓ Systematically contest all their decisions and criticize their work in an exaggerated or unfair way;
- ✓ Verbally assaulting, directing contemptuous gestures, altering the tone of voice or threatening other forms of physical violence;
- ✓ Control the frequency and time of use of toilets;
- ✓ Instigating the control of one employee by another, creating control outside the context of the hierarchical structure to generate distrust and avoid solidarity between colleagues.
- ✓ Ignore the presence of the harassed person, addressing only the other employees;
- ✓ Pass on humiliating tasks;
- ✓ Yelling or speaking disrespectfully;
- ✓ Spread rumors or spread offensive rumors about the employee;
- ✓ Not taking into account your health problems;
- ✓ Criticize the victim's private life;
- ✓ Assign derogatory nicknames;
- ✓ Imposing vexatious punishments (dancing, gifts);
- ✓ Post derogatory messages in groups on social media;
- ✓ Avoid direct communication, addressing the victim only by email, tickets or third parties and other forms of indirect communication;
- ✓ Physically isolate the employee so that there is no communication with other colleagues;
- ✓ Unjustifiably disregarding or mocking the victim's opinions;
- ✓ Some specific examples of bullying against women:
- ✓ Make it difficult or prevent pregnant women from attending medical appointments outside the company;
- ✓ Interfering with women's family planning, demanding that they not become pregnant;
- ✓ Disregarding medical recommendations to pregnant women in the distribution of tasks;

- ✓ Summarily disregard the woman's technical opinion in her area of expertise.
- ✓ Removing positions and functions without just reason; and
- ✓ Imposing personalized work conditions and rules, different from those charged from other professionals.

Some specific examples of bullying against women:

- ✓ Make it difficult or prevent pregnant women from attending medical appointments outside the company;
- ✓ Disregarding medical recommendations to pregnant women in the distribution of tasks;
- ✓ Interfering with women's family planning, demanding that they not become pregnant;
- ✓ Summarily disregard the woman's technical opinion in her area of expertise.

### 3.2. What is sexual harassment?

Sexual harassment is defined by law as the act of “embarrassing someone, with the aim of obtaining sexual advantage or favor, the agent taking precedence over his/her condition of hierarchical superior or ancestry inherent to the exercise of a job, position or function” (Code Penal, art. 216-A).

In the work environment it is conduct of a sexual nature, manifested through words, gestures, or other means, proposed or imposed on a person against their will, causing embarrassment and violating sexual freedom, considered unpleasant, offensive and impertinent.<sup>3</sup>

To characterize sexual harassment, the “non-consent” of the harassed person is necessary and the objective – on the part of the harasser – to obtain an advantage or sexual favoritism.

It is important to know that sexual harassment is not characterized only by physical contact, it can be carried out explicitly or subtly, with physical or verbal contact,

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<sup>3</sup> (Senado Federal – Assédio Moral e Sexual no Trabalho – Acesso: <https://www12.senado.leg.br/institucional/procuradoria/proc-publicacoes/cartilha-assedio-moral-e-sexual-no-trabalho>)



and, as already explained, through spoken or written expressions, or means such as gestures, images sent by emails, comments on social networks, videos, gifts, among others.

### 3.2.1. Types

There are two types of sexual harassment:

- **Sexual harassment by blackmail:** it occurs when there is a demand for sexual conduct, in exchange for benefits or to avoid harm in the work relationship. The aim is to obtain sexual favoritism; and
- **Sexual Harassment by Intimidation:** occurs when there is untimely sexual provocation in the work environment, with the effect of harming a person's performance or creating an offensive, intimidating or humiliating situation, characterized by impertinence, hostility, manifesting in a relationship of power or force not always in hierarchy. The aim is to make the environment hostile, while also gaining a sexual advantage.

It can occur in the following ways:

- **Vertical:**  Occurs when the employee, whether male or female, in a superior hierarchical position, uses his position of power to embarrass someone, with intimidation, pressure or other interference, with the objective of obtaining some sexual favor.
- **Horizontal:**  Occurs when there is no hierarchical distinction between the person who harasses and the person who is harassed, such as the embarrassment verified between co-workers.

### 3.2.2. harasser and harassed

Anyone can practice moral harassment, both men and women, being characterized as the harasser. Anyone, both men and women, can experience bullying, or a group of people.

It is important to note that although it can occur with both genders and sexual identification, women are more susceptible to this type of harassment, especially black women and the LGBTQIA+ group.

### 3.2.3. Examples of Sexual Harassment

We will put some examples of sexual harassment situations, so that they can be identified and understood. However, it is merely an example, there are other situations.

- ✓ Insinuations, explicit or veiled, of a sexual nature;
- ✓ Gestures or words, written or spoken, of a sexual nature;
- ✓ Promises of differentiated treatment;
- ✓ Blackmail for permanence or promotion in employment;
- ✓ Threats, veiled or explicit, of reprisals,
- ✓ Like losing your job;
- ✓ Employment status or as a basis for employment decisions;
- ✓ Unwanted conversations about sex;
- ✓ Telling jokes or using expressions of sexual content;
- ✓ Unwanted physical contact;
- ✓ Requesting sexual favors;
- ✓ Naughty invitations; and
- ✓ Pressure to participate in “meetings” and outings;

### 3.3. What is Bullying?

Conduct that a reasonable person might perceive as hostile and offensive, including, but not limited to, repetitive verbal aggression, physical or psychological violence, which could be perceived as threatening, intimidating or humiliating, or sabotage or intentional damage to the work performed by someone else.

### 3.4. Other forms of illegal harassment.

Harassment based on sex, race, color, religion, creed, age, sexual orientation, marital status, national origin, citizenship, family status, physical or mental disability, pregnancy, or any other category prohibited by federal, state, or local law.

This Illegal Harassment may be verbal (including but not limited to jokes, insults, gestures or teasing), graphic (including but not limited to offensive images, symbols, drawings, electronic messages, emails or any other form and message )



or physical conduct (including, but not limited to, physical threat, physically opposing someone's passage) that violates, shows hostility or aversion to an individual because of any of the characteristics mentioned herein.

It may perfectly fit into other harassments highlighted above.

## **4. GUIDELINES**

### **4.1. No Tolerance**

At Yssy, harassment of any kind and form, as well as Bullying and discrimination, is unacceptable, whether on Company premises or in any work-related environment and situation, including, but not limited to, business travel, office, parties and other corporate events.

### **4.2. How to act: Victim and Colleagues**

Yssy recognizes that suffering victims and colleagues who have witnessed harassment and bullying may struggle with knowing how to respond. That way, this topic will have some guidelines. The important thing in these cases is to break the silence and seek help.

#### **4.2.1. Bullying and Bullying**

In relation to cases of moral harassment and bullying, the victim may:

- Gather evidence of harassment, such as saving emails, conversations and recordings of conversations or images. Write down, in detail, all the situations of harassment suffered with date, time and place, and list the names of those who witnessed the facts;
- Seek help from colleagues, especially those who witnessed the fact or who have been through the same situation;
- Seek psychological guidance, through the " *support pass*" offered by the company to all Yssy employees. This help can guide you on how to behave to face such situations;
- Communicate the situation to Human Resources, the hierarchical superior of the harasser (if he is not the harasser) and/or the Ethics Channel; and

- It is important when reported to the Ethics Channel to bring as much detail as possible so that the investigation and eventual punishment of the harasser can be carried out.

Co-workers also play an important role in combating harassment if they witness or learn of harassment:

- Offer victim support;
- Encourage the responsible areas to report the case;
- Make yourself available as a witness, if you have witnessed or have been through a similar situation; and
- Inform Human Resources, the harasser's hierarchical superior (if he is not the harasser) or the Ethics Channel.

As stated, the important thing is to communicate the case to the responsible areas, and to combat this type of behavior.

#### **4.2.2. Sexual harassment**

Sexual harassment is often more difficult to obtain evidence as it usually only occurs when only the victim and the harasser are present. The cycle of silence caused by fear, embarrassment or shame often contributes to harassment occurring more often, or even with other people. For this reason, it is necessary to break the barrier of silence. Yssy guides victims as follows:

- Gather as much evidence as possible (if there is not a lot of evidence , no problem), such as tickets, gifts, conversations and recordings of conversations or images and witnesses;
- Form a support network;
- Seek psychological help through the "support pass" offered by the company for all Yssy employees;
- Report it to Human Resources or the Ethics Channel. So we can guide how to act. In more serious cases, we will be able to carry out all the support and guidance of the measures to be adopted; and

- It is important when reported to the Ethics Channel to bring as much detail as possible so that the investigation and punishment of the harasser can be carried out.

Co-workers also play an important role in combating sexual harassment if they witness or learn of harassment:

- Offer shelter and support to the victim, including in the collection of evidence;
- Encourage the responsible areas to report the case;
- Make yourself available as a witness, if you have witnessed or have been through a similar situation; and
- Report it to Human Resources or the Ethics Channel.

Yssy will take cases received very seriously, ensuring confidentiality and proper protection for those who report cases of harassment or bullying, or for others involved. There will be no retaliation. Finally, ensure proper investigation into all cases you receive.

## 5. ETHICS CHANNEL

Yssy has a confidential channel, managed exclusively by an independent and specialized company that guarantees anonymous reporting, if the declarant so wishes, available to employees, third parties, partners, suppliers and other parties that interact with it, which is intended for the communication of any violation or suspected violation of this Anti-Harassment Policy, Code of Ethics and Conduct, Anti-Corruption/Anti-Bribery Policy, Anti-Bribery Management System, or may report weaknesses or request clarification and guidance if faced with a concern or situation that may involve bribery or harassment of some way.

Reports to the Ethics Channel can be formalized on its own platform on the internet, by phone (toll free) or by email, as follows:

- Ethics Channel on the Internet: <https://aloetica.com.br/yssy>
- Ethics Channel by phone: 0800 838 0002
- Ethics Channel by email: [grupoyssy@aloetica.com.br](mailto:grupoyssy@aloetica.com.br)

Confidentiality and protection of those who report, and others involved or mentioned in the report, are ensured from the moment of receipt until final disposal after analysis and investigation.

## 6. TRAINING

Training on the subject will be carried out for leaders and employees. In this way, they will be able to identify, prevent and combat cases of harassment.

The training will take place by the Compliance area, with the help of the Human Resources area and will be included in the Compliance area's training and communication plan.

## 7. SANCTIONS

The violation of this Anti-Harassment Policy by an employee can cause damage to the work environment, to the employees present, to the reputation, in addition to causing financial losses.

Violations of this Policy must be reported immediately to the Ethics Channel and will be dealt with rigorously and with the consequent application of appropriate sanctions.

No employee will be exempt from disciplinary sanctions, regardless of their position in the company, if they violate or are involved in the violation.

It will not be allowed, under any circumstances, that an employee, regardless of their position, and/or business partner, suffers retaliation, discrimination or disciplinary action for reporting, in good faith, a violation or suspected violation of this Policy and the Code of Conduct, and/or for refusing to participate in violations, even if such refusal could result in the loss of business to the organization .

## 8. CONSIDERATIONS

This document is based on the Anti-Harassment Policy of September 1, 2020, prepared by Victoria Lekich, Compliance Lawyer. As well as in previous publications.

The following topics have changed:

Topics	Changes
No changes	

## 9. REFERENCES

**Yssy & CO.** (nd). Federal Senate – Moral and Sexual Harassment at Work –  
Access: <https://www12.senado.leg.br/institucional/procuradoria/proc-publicacoes/cartilha-assedio-moral-e-sexual-no-trabalho>.

**Yssy & CO.** (nd). TST – Moral Harassment Prevention Booklet – Stop and Repair –  
Access:  
<https://www.tst.jus.br/documents/10157/55951/Cartilha+ass%C3%A9dio+moral/573490e3-a2dd-a598-d2a7-6d492e4b2457>.

### **YSSY & CO**

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