

Human-Rights & Anti-Discrimination Policy December 2022

Sisal Responsible culture



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01 | Purpose & Scope

Sisal operates in an international and multicultural context and considers diversity a valuable asset to be valued. Welcoming, valuing diversity, and creating an environment where everyone is free to express themselves are central aspects of our culture, crucial for growth and the way we do business.

This means not only promoting the principles of diversity, inclusion, and equal treatment and opportunities but also committing to ensure the right to working conditions respectful of the person and their dignity:

- protecting the physical and psychological integrity and individuality of each person;
- opposing all forms of behavior that result in discrimination in relation to sex, age, disability, nationality, sexual orientation, ethnicity, religion, political opinions, and all other forms of individual diversity, or that are harmful to the person, their beliefs or preferences, their freedom of expression;
- protecting the right of the people who work with us to form or participate in organizations for the defense and promotion of their interests;
- respecting the right of people to be represented, within the various work units, by unions or other forms of elected representation in accordance with the legislation and practices in force in the various countries where we operate.

In this policy, we are committed and make reference to all those rights that are directly or indirectly influenced by our operations:

- basic human rights (such as: working hours, fair wages, minimum wage, workplace conditions, accessibility for people with disabilities, protection of maternity and paternity, absence of harassment, absence of child, forced/compulsory labor, absence of human trafficking);
- rights related to health and safety;
- right to non-discrimination;
- right to privacy and protection of personal data;
- o right to expression.

Scope

This policy applies to all Sisal employees, regardless of the country in which they work and the contractual status adopted. In implementing locally what is provided for by our policies, national and supranational regulatory frameworks and cultural practices in use if they are improvement-oriented prevail.

Policy Alignment

This policy is defined consistently with:

- Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
- Universal Declaration of Human Rights
- International Covenant on Civil and Political Rights
- International Covenant on Social, Economic and Cultural Rights
- United Nations Guiding Principles on Business and Human Rights
- United Nations Global Compact Principles
- ILO Declaration on Fundamental Principles and Rights at Work
- Global Network
 Initiative Principles

02 | Strategy

"Sisal wants to be the company where everyone contributes to growth and innovation because they are free to be themselves in expressing their potential." *Diversity, Equity & Inclusion Guidelines*

Sisal promotes and values diversity and engages with all generations and cultures, believing that diversity is a resource that makes us stronger in challenges and an opportunity for enrichment.

Diversity, Equity, and Inclusion (DEI) are fundamental values and an integral part of our Sustainability strategy at Sisal. We have defined some strategic objectives to focus on to further affirm the value of inclusion, diversity, and equity.

We believe that the full expression of our diversity allows us to manage changes more flexibly, always ready to transform what we do and how we do it. Our diversity allows us to maintain the standards of innovation that have distinguished us so far. We have worked, and continue to do so, on our culture to maximize the positive impact of the company and of each individual. We believe that to make a real difference, for the people of Sisal and for society, each one must take personal responsibility. Working on our culture means working so that everyone feels connected and participates in achieving our Equity, Inclusion, Diversity, and Anti-Discrimination goals.

Diversity & Inclusion Strategic-Goals

Achieving Gender Balance at All Levels

Sisal is committed to ensuring gender balance representation at all levels of the organization: professional, middle management, and C-level. It is a medium-term objective. We continuously measure our actions and outcomes using all available tools: talent acquisition, career development, skill building, and creating the best and fair conditions for performance..

Closing the gender gap

Sisal takes proactive measures, within the framework of remuneration and promotion policies, to close the wage and professional growth gap between men and women in equal roles and performance, including periodic quarterly monitoring of gender gap indicators to facilitate decisionmaking processes.



03 How do we work to make it happen?

At Sisal, we work on multiple fronts to prevent and/or manage any form of discrimination and human rights violations: Culture and Communication, Processes and Objectives, Monitoring and Analysis, Listening and Zero Tolerance. This policy outlines the set of actions we have taken and that we are all called to support to have a truly inclusive work environment, from which any form of discrimination and harassment is banned.

01 | Culture & Communication

At Sisal, we have various training programs and awareness initiatives for the entire company to support and spread the culture of inclusion and raise awareness about biases and discriminatory behaviors. Continuous communication and information is provided through accessible channels, such as the company's intranet.

02 Processes & Goals

We have redesigned the Human Resources processes for candidates and employees at Sisal to ensure equal opportunities at all times. DEI goals are incorporated into the strategic plan and the individual manager objectives (MBO) system.

03 | Monitoring & Analysis

We periodically monitor the achievement of our goals and the adherence to the policies we have defined. We analyze the composition of the Sisal personnel to identify traits and communities and design targeted services and proposals. We detect and manage the risks of discrimination and violation of human rights.

04 | Listening

We have established dedicated listening channels, such as whistleblowing, periodic surveys (e.g. DEI Index, eNPE, Culture survey), but, with the awareness that the absence of reports does not mean that everything is okay, we proactively act to capture specific needs and potential risk situations. Each of us, and managers in particular, must be a spokesperson for issues and needs that make Sisal increasingly inclusive.

05 | Zero Tolerance

Sisal proactively works to prevent and manage any form of discrimination and violation of human rights, including harassment in the workplace. Discrimination and harassment, both subtle and overt, can stem from deeply ingrained unconscious biases and learned behaviors. Sisal takes a zero-tolerance approach to ensure a truly inclusive workplace environment where everyone feels safe and respected



04 | Statement

Our Diversity, Equity & Inclusion Guidelines define what type of organization we aim to be.

At Sisal, we want to:

- Create an inclusive workplace that embraces every gender, generation, culture, and ability identity and respects each person's contribution
- Value every gender, generation, culture, and ability identity by encouraging collaboration for responsible growth
- Counter disrespectful, discriminatory or belittling behaviors and language that harm the spirit that unites us
- Engage all of our people so that everyone feels part of this journey

Respect for diversity and equal opportunities and the prevention of any form of discrimination are principles that Sisal is committed to ensuring in every phase of the employment relationship, from the hiring process to the definition of compensation, to professional growth opportunities, to the conclusion of the employment relationship.

Creating value by valuing diversity

"Our DEI mission: to accept and support every individual, valuing gender, generation, culture, and ability identity, because the only way to create value is to build together a welcoming, inclusive, fair, attentive, and respectful work environment.."

Diversity, Equity & Inclusion Guidelines







05 | Behaviors

01 Understand, respect, and appreciate every identity

- Recognizing our own biases and those of others
- Creating a work environment where everyone feels safe and free to express themselves
- Actively listening, promoting open dialogue and discussion
- Using respectful and mindful language, both written and spoken
- Valuing and recognizing the strength of diversity of ideas, opinions, and perspectives as drivers of acceleration

02| We promote the inclusion and integration of every identity

- Promoting the contribution of each individual and encouraging active participation
- Identifying and recognizing those who demonstrate inclusive behaviors
- Encouraging cross-functional team work
- Fostering full engagement of top management
- Supporting colleague growth through targeted professional, personal, and team development decisions taking into account talent and aspirations
- Providing mentorship and coaching paths

03 | Working to Promote Change

- Working to promote change by being promoters and agents of change
- o Countering behaviors that are not aligned with desired behaviors
- Managing conflict constructively
- Preventing and avoiding gossip, and constantly measuring progress and successes

Diversity, Equity & Inclusion Guidelines



06 | Governance

Recognizing the value of diversity within and among our external stakeholders means that we proactively govern the evolution of our Inclusion & Anti-Discrimination policies and programs to seize all current and future opportunities and potential.

1 | Leadership Team

The DEI themes are an important component of Sisal's Corporate Strategy.

It is the responsibility of the Top Management:

- To implement the medium and long-term strategy and goals of Inclusion & Anti-Discrimination within the company's strategic plan, also in line with the adopted ESG framework;
- To define and implement programs and initiatives for creating a more inclusive environment;
- To reduce the risks of unconscious bias in Sisal's way of operating, both towards and with its employees and towards and with external stakeholders;
- To promptly and rigorously manage all behaviors that are not consistent with what is expected and desired in terms of DEI.

2 Human Resources

It is the responsibility of the HR team:

 To monitor the performance of Gender Pay Gap indicators on a quarterly basis and take all actions aimed at creating equality and culture on all DEI issues.

3 | Compliance

It is the responsibility of the Compliance team:

• To verify the dissemination and proper adoption of Sisal's policies on DEI.

4 Inclusion Team

In 2021, we chose to make our commitment to strengthening the culture of inclusion and diversity, both inside and outside the Group, a reality by creating the Inclusion Team.

The Inclusion Team is a voluntarily participated organization, it includes Clevel managers, managers, and professionals from all company realities. The mission of the Inclusion Team is to promote inclusion and diversity in all forms.

The responsibilities of the Inclusion Team are:

- Maintaining an active listening channel on the subject through surveys, focus groups, interviews;
- Defining a clear vision that, in line and synergy with that of the business, enables Sisal to reach excellence levels on the DEI front;
- Defining and implementing diversity initiatives, programs and projects;
- Periodically evaluating internal policies and initiatives with the support of the HR Team;
- Increasing visibility and bringing the voice of underrepresented communities in Sisal to the forefront;
- Guaranteeing representation of all diversities and free association.

07 | Responsibilities

We have the responsibility to put our DEI commitments into practice every day. Everyone. Each of us is called to do our part in creating and maintaining a truly inclusive environment.

1| Everyone

We expect all people at Sisal to:

- Treat each individual with respect;
- Contribute to creating an inclusive environment free of any form of discrimination or harassment where everyone is welcomed, valued, respected, and heard;
- Act as role models by demonstrating in their daily behaviors and actions what it means to embrace and value diversity;
- Provide concrete support for the implementation of DEI programs and initiatives;
- Dedicate time to learning about and exploring inclusion and diversity issues;
- Embrace different ideas and perspectives from their own;
- Speak openly if they observe behaviors that are in conflict with this policy and/or otherwise harmful to the dignity of the person.

2 | Managers

We expect our managers to:

- Create and support an inclusive workplace where everyone's unique contribution is recognized;
- Act as role models by demonstrating in their daily actions and decisions what it means to recognize and appreciate merit and talent, regardless of who expresses it;
- Share and promote our inclusive approach and celebration of diversity both internally and externally;
- Stay attentive to pick up on unspoken needs and take action in all cases where there is misalignment or a violation of behaviors in accordance with what is expressed in this Policy;
- Provide a safe space for everyone to feel free to engage, express their ideas, and share their concerns.

3 Human Resources

We expect the HR team to:

- Ensure that inclusion and diversity are fully integrated into all HR processes, policies, and procedures.
- Implement a fair and inclusive Talent Acquisition process at every stage, from job description to interview management.
- Implement a Career Management process that recognizes and values performance, experience, and skills in terms of promotions, compensation policies, development, and training, regardless of an individual's characteristics.
- Continuously monitor that processes, procedures, and rules are implemented in accordance with DEI principles and measure their indicators.
- Promote an inclusive culture and behaviors.

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08 Committment to Anti-Discrimination

Workplace harassment, in any form and type, is a form of discrimination and at Sisal we proactively fight against it. This policy aims to prevent and combat harassment, violence, and discrimination in the workplace.

We do not tolerate any illegalities, harassment, discrimination, in whatever form and by whoever involved. When we talk about harassment, we refer to the workplace in a broad sense, including all public and private, physical and virtual spaces where work is performed.

We want each person at Sisal to embody and act on our values, and for all to be treated with dignity and respect.

01| Physical harassment

We are referring to physical harassment when:

- One or more employees are subjected to abuse, threats and/or humiliations while carrying out their work;
- One or more employees feel physically attacked or threatened, or in extreme circumstances, attacked while carrying out their work.

02 | Sexual harassment

We speak of sexual harassment when behaviors are adopted against a person based on gender, sexuality, sexual orientation, gender identity, gender expression or gender selfdetermination. By way of example, the following are considered sexual harassment:

- Solicitation, innuendos or sexual advances made by those in a position to grant, grant or deny an advantage, opportunity, or promotion (known as "quid-proquo" sexual harassment)
- Solicitation, innuendo or sexual advances made by someone who should reasonably know that the solicitation or advance is unwelcome.

Sexual harassment can be explicit or implicit.

03 | Psychological harassment

We're talking about psychological harassment in all situations where behaviors are adopted that diminish and offend the person on a personal and/or professional level. Forms of psychological harassment, for example, include isolating or denying presence, belittling or trivializing thoughts, discrediting or spreading rumors, comparing with others, verbally abusing, physically threatening, and obstructing performance.

04 | Discriminatory harassment

We refer to discriminatory harassment when actions put at risk and/or explicitly contradict the principles of inclusion and equity in processes and decisions regarding hiring, promotions, compensation, development, training, and all other terms and conditions of employment, which must be carried out without regard to age, race/ethnicity, color, sex, national origin, religion, disability, sexual orientation, gender identity or expression, political orientation, or any other form of discrimination as recognized by the laws of the countries where Sisal operates.

05 | Verbal harassment

We talk about verbal harassment when verbal behaviors do not respect the dignity and diversity of the individual and are unpleasant and offensive in content and manners.

6 Cyberbullying

We are talking about cyberbullying when harassment occurs on digital devices and platforms such as cell phones, computers and tablets, both business and non-business social media: SMS, email, instant messaging and apps, or online on social media, forums or communities where people can view, participate in or share content. Cyberbullying involves the sending, publishing, or sharing of negative, harmful, false, or mean content about a person, including personal and private information.

09 Anti-Discrimination & Anti-Harassment: what we do

Embracing diversity requires flexibility, responsibility, trust, and courage. While similarities confirm what is already there and what we already know, diversity is the condition for generating something new.

On this journey we have chosen, it can happen that something goes wrong and does not work as we expect.

It is the responsibility of each of us to contribute to building an inclusive environment.

If you have any doubts about how to behave or how to interpret the behavior of others: **stop**, **think**, and **ask**.

You will find here the options you have to communicate and ask for support.

Sisal is committed to considering and following up on every report, no matter what channel it is made through.

01 | Do what's right

It is each of our responsibility:

- to do the right things to ensure a workplace where harassment and discrimination of any kind are banned
- to openly speak out when witnessing unacceptable behavior without fear of retaliation.

02| Speak-up culture

If you observe, suspect, or experience unacceptable behaviors, please let us know. You can talk to your manager, Human Resources, or if you prefer and feel more comfortable, you can use our dedicated Whistleblowing platform to collect and handle these reports. We will treat every report with discretion and confidentiality. If you prefer, you can remain anonymous. We expect reports to be made in good faith.

03 Go in to detail

Let's thoroughly investigate each report. To do this, we need details about the behavior or behaviors you have observed or experienced, the people involved, the times, places, and modes, and any other witnesses.

04 | Zero-tolerance

We have only one way at Sisal to deal with harassment and discrimination of any kind: we do not tolerate them.

10 | Definitions

The words of this policy:

Discrimination

Discriminatory treatment of individuals or groups based on:

- o Age
- Race
- Nationality
- Ethnicity
- o Gender
- Gender identity
- o Gender expression
- o Disability
- Religious orientation
- Sexual orientation
- Social background
- Marital status
- Political affiliation

Discrimination, intentional or not, has the effect of preventing or limiting access to opportunities, benefits or advantages that are available to other members of society, typically identified as the majority. It is not discriminatory practice to adopt or implement special programs aimed at alleviating difficulties and/or economic disadvantage, or to assist disadvantaged individuals or groups (so-called minorities) in achieving or attempting to achieve equal opportunities, or that may contribute to the elimination of human rights violations.

Diversity

When we talk about diversity, we refer to a balanced mix of people who are different in age, gender identity and expression, a range of social and ethnic origins, nationalities, social status, health status, religion and beliefs, sexual orientation and identity, present in a group or organization like Sisal. Recognizing and respecting our differences is the first step towards creating a work environment that values diversity.

Equity vs Equality

Equity means recognizing the dignity and value of every person and ensuring that each person enjoys equal rights and opportunities without discrimination. Equity does not mean treating people the same way (equality) without taking into account individual differences. Equity recognizes that each person has different circumstances and allocates the necessary resources and opportunities to achieve equal results. For us, this means that all employees and candidates must have equal opportunities in terms of:

- Access and development regardless of individual background
- Achieving their potential and valuing their skills and expertise

Inclusion

It is the creation of a climate of understanding and mutual respect for the dignity and value of each person, so that everyone feels part of the community and can fully contribute to its development and well-being. Inclusion defines the way we want to be, the behaviors we consciously want to implement in every business process and decision. Inclusion means creating connections between everyone and Sisal's values.

Bias

These are all forms of prejudice and unconscious biases in behavior that generate discrimination and disparities in opportunities.

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Annex:

- A | Commitment to Gender Inclusion
- B Commitment to Disability Inclusion



A| Commitment to Gender Inclusion

Within the framework of DEI policies, Sisal has defined a commitment and specific goals related to Gender Equality to improve gender equality and balance:

- Zero Gender Pay-gap
- Greater presence of women in management positions

Sisal achieved Gender Equality Certification in 2021 with the Winning Woman Institute. And the journey continues!



01| Women Empowerment

Since 2016, the *Wise Woman community in Sisal Experience* has been active, which values the role and contribution of women in the company, including through leadership development programs and coaching initiatives..

03| Culture

We involve all people at Sisal in initiatives and programs to raise awareness of diversity, inclusion, and collaboration.

05 | Flexibility

Sisal provides flexible work solutions to allow women better access to professional opportunities.

07 | Improving Gender Balance in Management

Sisal aims to significantly improve the gender balance in management positions both through talent acquisition policies and through career processes that value the merit, skills, and performance of women. This goal also includes the top management for full participation of women in decision-making and leadership processes.

02 | Talent Acquisition

We increase the number of female hires in all organizational areas and at all levels: C-level, manager, professional, in line with group and talent acquisition goals.

04| Parenthood & Familyfriendly solutions

We have active and evolving services to support new mothers, fathers, and parenthood in general to promote work-family balance and a smooth return to work.

06| Monitoring of Equal Pay

Sisal periodically monitors the pay gap between men and women in equivalent roles and defines actions and decisions to be taken to eliminate this gap.

08| External Representation

Sisal has adopted gender equality criteria in the management of external relationships and communications, giving visibility, representation and voice to the skills and professionalism of Sisal women.

Sisal Responsible culture

INTERNAL USE

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B Commitment to Disability Inclusion

In Sisal, inclusion policies and programs are designed and implemented to ensure that underrepresented groups have access to all opportunities and can fully realize their professional potential. We want people with

cognitive and physical disabilities to have full access to these opportunities and implement programs and actions to become increasingly capable of recognizing and valuing the talent of each person.

01 | Inclusion team

The Inclusion Team is open to receive requests and participation from people with disabilities, in order to design and implement programs and initiatives that make the workplace increasingly inclusive and accessible.

03 Accomodation

We create the conditions for working independently: the person with a disability finds in Sisal an active partner in removing obstacles and finding solutions to fully realize themselves professionally.

05 Advocacy

We want to use our voice: we want to contribute with our voice to raise awareness in society at large towards the inclusion of people with disabilities and their families.

02 | Talent Acquisition & Career

Discrimination on the basis of disability, physical or cognitive, is not tolerated on a par with other forms of discrimination. We have made the workplace accessible in order to attract, retain and develop people with disabilities.

04 | Procurement

In the purchasing processes we take into account the characteristics that services, facilities and tools must have in order to guarantee full accessibility, usability or adoption for all.

