

PLAYBOOK

PREVENTING HARASSMENT AND DISCRIMINATION

Summary

1. Introduction	3
2. Purpose of the playbook	3
3. Common misunderstandings	4
Management issues	
4. Noncompliance with the Code of Ethics and Conduct	6
4.1. Unacceptable behavior	6
4.2. Discrimination	7
4.3. Moral harassment	8
4.4. Damage caused by moral harassment	12
4.5. Inappropriate behavior	14
4.6. Sexual Harassment and other sexual violence	16
5. Hotline	19
6. Reflection	22

1. Introduction

In accordance with TAESA's Code of Ethics and Conduct and other regulations in the Compliance department, this playbook aims to clarify the different ways to approach and solve everyday situations in interpersonal relations.

It differentiates between issues that are common misunderstandings and those that are unacceptable and should be reported to the Company's Hotline.

2. Purpose of this playbook

This playbook was developed for TAESA's employees, young apprentices, trainees, board members, officers, service providers, business partners, suppliers and related parties.

It aims to explain the topics mentioned throughout its content, and is applicable in the physical or virtual workplace, in addition to any trips and external activities.

3. Common misunderstandings

Management issues

We all disagree with our peers and/or have a different view at work. But it should be noted that not all of these cases violate our **Code of Ethics and Conduct**.

Management issues are under the Compliance team responsibility and are the subject of internal investigations. They should be dealt with by the People department to promote interdependence and encourage the resolution of small conflicts.

Some of the factors that can cause discussions or disagreements are as follows:

- Work schedule and working hours (except for non-compliance with legislation and failure to respect rest time, which can be harmful to employees' lives);
- Labor benefits;
- Bonus payments;
- Reimbursement of expenses;
- Career plan, including promotions and internal or external hiring;
- Compensation (with the exception of non-payment of salary in accordance with the contract);
- Defining, aligning and demanding the achievement of targets;

- Criticism of managers (except for disrespectful or offensive criticism);
- Criticism of the People department (never offending or disrespecting the people who are part of it);
- Criticism of processes (must follow processes until any changes are formalized);
- Criticism of negative feedback (never offending or disrespecting the person who carried out the evaluation).



These issues **should be discussed openly** with the People department. Clarifying procedures and welcoming any doubts or suggestions is key. Clear and direct communication is key to modernizing and updating processes, which allows for important dialogues.

Lastly, we would like to emphasize that, in general, the items mentioned do not contradict **the Code of Ethics and Conduct**. However, the topics mentioned herein should be reported to the Company's hotline if someone is a victim or witnesses any irregularity.



4. Noncompliance of the Code of Ethics and Conduct

4.1. UNACCEPTABLE BEHAVIORS

In this chapter, we will address behaviors, facts, actions or omissions that directly contradict **TAESA's Code of Ethics and Conduct**. These are important to maintain TAESA's good reputation and complying with Brazilian law.

Although some are complex, we must not act solely on our personal understanding. If you have any questions, contacting the Compliance team to evaluate behaviors is key. The team is always ready to help with everyday ethical decisions and dilemmas through the following email compliance@taesa.com.br.

We have selected some issues for clarification that may be difficult to understand on a day-to-day basis but are of great importance to TAESA and society as a whole. How about learning more about each one?

4.2. DISCRIMINATION

Described as any form of unequal, unfair or differentiated treatment directed at a person or group, based on characteristics protected by legislation. This includes but is not limited to social status; racial issues; gender; sexual orientation; nationality; place of birth; religion; economic situation; physical condition; political orientation; age; intellectual condition; among others.

Some discriminatory behaviors can constitute crimes, such as sexual harassment, racial slurs or prejudice, if they meet certain legal criteria.

Some types of discrimination are as follows:



Ableism: discrimination against people with disabilities.



Ageism: prejudice related to the age of a person or group.



Fatphobia: stigma or prejudice against people who are overweight or obese.



LGBTphobia: discrimination or violence against people based on their sexual orientation or gender identity.



Misogyny: disrespect, aversion or hatred towards women, often expressed through discriminatory or violent attitudes and behavior.



Racism: based on color, race or ethnicity, including the belief in the superiority of some over others and denial of rights on this basis.



Xenophobia: prejudice against different cultures, including the characterization of people, behaviors and accents of a specific region, in addition to the belief in the cultural, economic and intellectual inferiority of the victims.

4.3. MORAL HARRASMENT

It is characterized by the repeated and prolonged exposure of a person, individually or as a group, to situations of humiliation, embarrassment, intimidation, aggression or contempt. This abusive conduct has a negative impact on the victim's personal and professional life, affecting their dignity and psychological or physical integrity.

Moral Harassment
IS NOT
The Victim's Fault





Point of attention:

Proving the aggressor's intentionality is not a requirement for a behavior to fall into this category. It can be any behavior that meets the following criteria:

- Repetition (habituality);
- Directionality (directed at a specific person or group);
- Temporality (duration over time).

It can be expressed in three different ways:

- **Interpersonal moral harassment** occurs on an individual and targeted basis, with the aim of harming or excluding an individual from their team.
- **Institutional, organizational or collective moral harassment** occurs when the company encourages or tolerates actions of harassment, characterized by continuous hostility and embarrassment, as part of the organization's strategies to increase productivity, reduce costs, reinforce control or exclude workers.
- **Vertical moral harassment** occurs between people at different hierarchical levels and can be:
 - (i) **Descending:** practiced by someone in a higher hierarchical position, such as bosses towards subordinates.
 - (ii) **Ascending:** practiced by someone in a lower hierarchical position, i.e. by subordinate(s) against the boss.



What does the law say?

Federal Constitution:

The foundations of the Federative Republic of Brazil are as follows: the dignity of the human person and the social value of work (art. I, III and IV). The right to health, work and honor are guaranteed (art. 5, X, and 6).

Civil Code:

Art. 186 - Anyone who, through voluntary action or omission, negligence or recklessness, violates a right and causes, even if only morally, damage to another, is committing a wrongdoing.

Criminal Code:

Art. 146 - Forcing someone, using violence or threatening the person, or after reducing their resistance by any other means, not to follow the law or to violate it.

These legal provisions aim to protect the dignity and physical/psychological integrity of workers, highlighting the seriousness of any form or moral harassment in the workplace.

You look so great today. When can I take you to dinner? IF YOU CAN'T DO WHAT I TELL YOU TO DO, JUST QUIT!

Take my son to the doctor! THAT MAKES NO SENSE! YOU KNOW, THE CLOTHES YOU WEAR ARE VERY DISTRACTING FOR MEN, EVERYONE SAYS SO! You are so lazy!

I won't even waste my time giving you a task!

THERE ARE PLENTY OF PEOPLE LIKE YOU OUT THERE!

IF YOU DECIDE TO GO IT IS ON YOU.

Respectful Women don't get picked on. YOU DO A MEDIOCRE JOB!

His is much better! DOCTOR DURING OFFICE HOURS?

What do you do from 6 pm until 7 am?

4.4. DAMAGE CAUSED BY MORAL HARRASMENT

Moral harassment can cause psychological, physical, social and professional damage to those who suffer it.



Psychological: depression, feelings of guilt, shame, rejection, sadness, inferiority, low self-esteem, constant irritation, negative feelings about the future, isolation, reduced concentration and ability to remember events, suicidal thoughts, among others.



Physical: digestive disorders, hypertension, palpitations, tremors, crying spells, generalized pain, changes in libido, worsening of pre-existing illnesses, changes in sleep, headaches, stress, work-related illnesses, suicide attempts, among others.



Social: withdrawal into relationships with friends, relatives and work colleagues, isolation, deterioration of family relationships and a decreased ability to make new friends, among others.



Professional: difficulty concentrating and lower productivity, errors in carrying out tasks, inability to work, intolerance of the work environment, quitting work, unnecessary reactions to management requests and risk of accidents at work.

In addition to the personal damage caused to the harassed person, it can also have an impact on the company in the following ways:

- Low productivity.
- High staff turnover.
- An increase in errors and accidents.
- Absences from work.
- Medical leaves.
- Damage to the corporate image in society.



What should you do when you witness any form of harassment?

Show solidarity, offer support to the victim, make yourself available as a witness.

If you prefer, confidentially or anonymously report the situation to the **Hotline**.

Anyone can report harassment or bullying in the workplace. Know something? Report it! Your identity will be preserved.

Offering help is key! Whenever a situation arises, first show support to the victim.



4.5. UNACCEPTABLE BEHAVIORS

Moral harassment is not just unacceptable behavior. Learn the difference:

Inappropriate behavior: sporadic actions, such as comments or behaviors that can embarrass another person. Although they are harmful and detrimental to the working environment, these may occur occasionally and are not part of an ongoing management method or relationship. Other examples include swearing, bad jokes, rudeness, shouting, slamming doors or tables, etc.

What is not moral harassment?

Differentiating between harassment and ordinary conflicts at work or negative feedback is key.

Conflicts at work - these are part of human relations and not every disagreement or friction is harassment. **These usually:**

- Are clear and open divergence of ideas;
- Involve direct and frank communication;
- Involve direct interaction between those involved;
- Do not significantly alter the organizational climate;
- are occasional confrontations.

Moral Harassment – defined as follows:

- Implicit disagreements;
- Covert communication;
- Negative impact on the organizational climate;

- Isolation of one or more individuals;
- Objective and persistent persecution;
- Systematic and permanent confrontations.

Negative feedback does not constitute moral harassment. It is a leader's responsibility to communicate when work is not being carried out as expected. This aims at aligning the expectations of the company with the employee.

Other situations that are not any form of harassment:

- Isolated or occasional behavior of an employee;
- Professional stress due to occasional workload peaks;
- Removal or change of role to rationalize or adapt the sector;
- Control of punctuality and team productivity within reasonable limits;
- Reasonable criticism or negative assessments of the work carried out.

Clarity on this issue is key to guarantee a healthy and fair working environment.



4.6. SEXUAL HARRASMENT AND OTHER SEXUAL VIOLENCE

Understanding the distinction between types of sexual violence is of utmost importance, whether in the workplace or in public places. We will further explain each one, including references to Brazilian legislation.

Sexual harassment:

Definition: to constrain someone with a view to sexual advantage or favor by taking advantage of a superior position or ascendancy at work. Power is an essential requirement

Legality: a crime under Article 216-A of the Brazilian Criminal Code.

Characteristics: do not require repetition, can occur physically, verbally or non-verbally, including gestures, messages, jokes, insinuations, blackmail or threats.

Sexual harassment

Definition: performing a libidinous act without someone's consent, with the aim of sexually satisfying oneself or a third party.

Legality: a crime under Article 215-A of the Brazilian Criminal Code.

Examples: touching sexual body parts without permission, and undue display of the body.

Rape:

Definition: to constrain someone, using violence against or seriously threatening the person, to practice intercourse or another libidinous act.

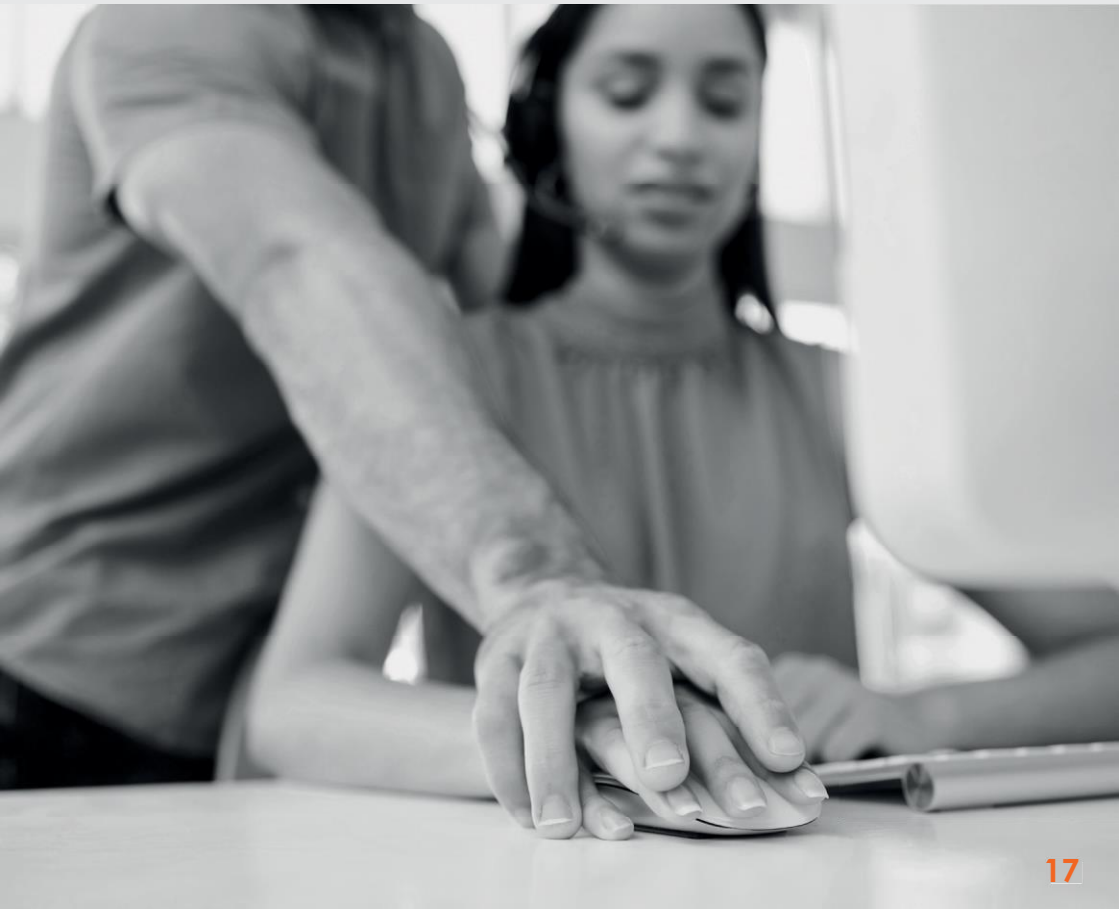
Legality: a crime under Article 213 of the Brazilian Criminal Code.

Examples: forcing someone to touch your private parts and forcing, threatening the person or coercing them to have sexual intercourse

Inappropriate behavior of a sexual nature:

Characteristics: inappropriate gestures or comments, which may not be directed at a specific person and do not fall under sexual harassment, but which cause embarrassment.

Examples: bad jokes, unsolicited massages, unwanted touching, showing of pornographic material.



What is not sexual harassment:

- Subtle and respectful comments, which do not professionally affect the person refusing flirtation;
 - Compliments with no sexual connotations;
 - Personal admiration;
 - Gifts on celebratory dates.
-

Flirting in the workplace:

Although it does not constitute harassment, it is advisable to avoid flirting in the corporate environment, especially when there is a direct work relationship, and the other person does not feel the same way or feel uncomfortable or when the flirting could influence professional decisions.

In addition to the Criminal Code, the Federal Constitution guarantees the inviolability of people's privacy, private life, honor and image (art. 5, X). The Consolidation of Brazilian Labor Laws ("CLT") also protects workers against discrimination of any kind (art. 373-A). Properly knows and respecting these legal provisions to ensure a safe and respectful working environment is key.

Federal Constitution – art. 5, X: People's privacy, private life, honor and image are inviolable, ensuring the right to compensation for material or moral damage resulting from their violation.

CLT – art. 373-A: It is forbidden to: III - consider gender, age, color or family situation as a determining variable for the purposes of compensation, professional training and opportunities for professional advancement.

5. Hotline

TAESA's Hotline is managed by an independent contractor, which guarantees anonymity, secrecy and confidentiality of information. In addition, it has a specialized team responsible for receiving and analyzing reports (via telephone or website) and forwarding them to the Compliance team and members of the Ethics Committee.

Everyone who uses this service will receive a protocol number, allowing them to follow the progress of the process.

Why is it important to report any and all situations?

- So that other people don't experience the same situation;
- To inhibit this type of behavior;
- To help foster a healthy working environment
- To let the harasser know that TAESA does not tolerate these behaviors (harassment/discrimination);
- To change the culture of silence;
- To strengthen the work of the Compliance team in combating this type of conduct.



TAESA encourages everyone to report to its Hotline if they witness violations of the Code of Ethics and Conduct or Brazilian laws, whether by phone, website or app:



contatoseguro.com.br/taesa



0800 800 6080

Gather evidence!



It is very important that the complaint has the minimum elements describing the irregularity. The victim should gather as much evidence as possible, such as photos, screenshots, copies of conversations, videos and audios. Providing the date, time and place where the situation occurred is also key. Providing the names of possible witnesses is also recommended.

Details are key to any investigation process.

Don't stay silent!



TAESA's Hotline is available 24 hours a day, seven days a week. If you choose to contact us by phone, you will find people who are trained to properly support you and write your report.

REMEMBER TO SEEK HELP!



6. REFLECTION

This playbook shows the key role we all play, regardless of our position or level of education, in contributing to a safe and healthy working environment at TAESA. Understanding everyone's role in this process, in addition to valuing mutual respect and ethics, is key. Always remember that you are not alone: we are together on this journey towards a space where everyone feels welcomed and valued. Your voice matters and we are here to listen and to take action whenever necessary.

In case of any violations of **the Code of Ethics and Conduct**, contact the Compliance team or send your report through the Hotline.

In accordance with TAESA's Code of Ethics and Conduct and other regulations in the Compliance department, this playbook aims to clarify the different ways to approach and solve everyday situations in interpersonal relations.

