

PROTOCOL FOR THE PREVENTION AND MANAGEMENT OF WORKPLACE HARASSMENT AND SEXUAL HARASSMENT AT WORK



GRUPO ARGOS

Investments that transform

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Integrity, ethics, and transparency are everyone's responsibility within the company. We promote a work environment free of workplace and sexual harassment, and we also have the necessary mechanisms in place for its prevention and for the timely handling of any cases that may arise.

1. OBJECTIVE

This protocol establishes the guidelines, mechanisms, and procedures for the prevention, handling, and management of workplace harassment and sexual harassment at work, as part of Grupo Argos's commitment to integrity, respect, and the well-being of all people who interact with the organization, promoting work environments that are safe, dignified, and free of any form of harassment.

2. SCOPE

This protocol applies to all Grupo Argos employees, regardless of their type of employment or hierarchical level.

Likewise, its principles and standards of conduct extend to third parties who interact with the organization, including contractors, suppliers, clients, visitors, and other external parties, in order to promote relationships based on respect and to prevent harassing conduct in any interaction associated with the company's activities.

3. PRINCIPLES

Application of the principles of respect, impartiality, confidentiality, and respect for due process is guaranteed when handling complaints of workplace harassment and sexual harassment at work filed within the company.

4. DEFINITION OF WORKPLACE HARASSMENT

In accordance with Article 2 of Law 1010 of 2006, as amended by Article 18 of Law 2466 of 2025 (Labor Reform), workplace harassment is any conduct, whether it occurs on a single occasion or repeatedly, aimed at instilling fear, intimidation, terror, and anguish, causing harm to employment, generating demotivation at work, or inducing resignation, and that is capable of causing physical, psychological, sexual, gender-based, or economic harm to the employee.

These behaviors may occur in a top-down vertical relationship, from superiors to subordinates, in a bottom-up vertical relationship, from subordinates to superiors, as well as horizontally among coworkers. They may also come from third parties linked to the work context, such as contractors, suppliers, clients, or visitors.

Some of the forms of workplace harassment are:

Workplace mistreatment:

Any act of violence against the physical or moral integrity, physical or sexual freedom, or property of the employee. Any injurious or offensive verbal expression that harms the moral integrity or the rights to privacy and good name of those involved in an employment relationship. Any behavior tending to undermine the self-esteem of those involved in an employment relationship.

Workplace persecution:

Any conduct whose repeated or clearly arbitrary nature allows one to infer the intent to induce the employee's resignation, through disqualification, an excessive workload, or permanent schedule changes that may cause work-related demotivation.

Workplace discrimination:

Any differential treatment based on race, gender, family or national origin, religion, political preference, or social status, or that lacks any reasonableness from a work standpoint.

Workplace obstruction:

Any action tending to hinder the performance of work, make it more burdensome, or delay it to the detriment of the employee, for example, withholding, concealing, or rendering unusable documents or tools needed for the job, destroying or losing information, or concealing correspondence or electronic messages.

Workplace inequity:

Any assignment that disregards equitable conditions for all employees.

Workplace lack of protection:

Any conduct tending to endanger the integrity and safety of the employee through orders or the assignment of duties without meeting the minimum protection and safety requirements.

5. CONDUCT THAT CONSTITUTES WORKPLACE HARASSMENT

- Acts of physical aggression, regardless of their consequences.
- Injurious or offensive expressions about a person, using foul language or references to race, gender, family or national origin, political preference, or social status.
- Hostile and humiliating comments disqualifying someone professionally, made in the presence of coworkers.
- Unjustified threats of dismissal made in the presence of coworkers.
- Multiple disciplinary complaints filed by any of the parties engaging in the harassment, the recklessness of which is proven by the outcome of the respective disciplinary proceedings.
- Humiliating disqualification, in the presence of coworkers, of work proposals or opinions.
- Mockery of a person's physical appearance or manner of dress, made in public.

- Public reference to facts belonging to a person's private life.
- The imposition of duties clearly unrelated to work obligations, openly disproportionate demands regarding the performance of assigned work, and abrupt changes in workplace or job duties with no objective basis related to the company's technical needs.
- Notoriously discriminatory treatment compared to other employees regarding the granting of labor rights and privileges, and the imposition of work duties.
- Refusal to provide materials and information that are absolutely essential for carrying out the job.
- Clearly unjustified refusal to grant permits, sick leave, ordinary leave, and vacations, when the legal, regulatory, or contractual conditions for requesting them are met.
- Sending anonymous letters, phone calls, and virtual messages with injurious, offensive, or intimidating content, or subjecting someone to a situation of social isolation.

In accordance with Law 2466 of 2025 (Labor Reform), the configuration of workplace harassment no longer requires the conduct to be systematic, habitual, or repeated over time: a single act is enough, whether it occurs on a single occasion or repeatedly, depending on the severity of the reported conduct and its capacity, on its own, to offend human dignity, life and physical integrity, sexual freedom, and other fundamental rights.

When the aforementioned conduct occurs in private, it must be proven by any means of evidence.

6. DEFINITION OF SEXUAL HARASSMENT

Sexual harassment shall be understood as any act of pursuit, harassment, or stalking of a sexual, lascivious, or lustful nature or connotation, expressed through vertical or horizontal power relationships, mediated by age, sex, gender, sexual orientation and identity, or work, social, or economic position, occurring once or repeatedly against another person in the work context.

Regardless of the nature of the employment relationship, the work context shall be understood to include interactions among workers, agents, employers, service contractors, interns, trainees, and other persons who take part in the work context.

7. SOME CONDUCTS THAT CONSTITUTE SEXUAL HARASSMENT ARE THE FOLLOWING:

- Unwanted physical contact, hugs, and kisses.
- Unwanted staring, lascivious looks, or sexual comments.
- Unwanted comments, jokes, or teasing with sexual connotations.
- Unwanted intimate questions about private life or physical appearance, or harassment using foul language.

- Emails, text messages, contact through social media or virtual chats, or any other medium with unwanted explicit sexual content.

8. THE CONDUCT SHALL BE PRESUMED TO HAVE BEEN COMMITTED IN THE WORK CONTEXT WHEN IT OCCURS IN:

- The workplace or wherever the contractual relationship takes place, in any of its forms, including public and private, physical and digital spaces, when these serve as a space for carrying out assigned duties, including working from home, remote work, and telework.
- The places where pay for the work performed is disbursed, in any of the contractual arrangements, where rest breaks are taken or meals are eaten, or where restroom or washroom facilities and locker rooms are used within the work context.
- Travel, trips, events, or social or training activities related to the work performed, in any of its forms.
- Within the framework of communications related to the work performed, in any of its forms, including those carried out digitally or using other technologies.
- Commutes between the home and the place where the work is performed, in any of its forms, when the sexual harassment is committed by a person who is part of the work context.
- In accommodation provided by the employer, when the sexual harassment is committed by a person who is part of the work context.

9. CONDUCT CLASSIFIED AS GENDER-BASED VIOLENCE AGAINST WOMEN AND LGBTIQ+ PERSONS IN THE WORKPLACE:

- Harassment or discrimination based on gender, identity, and sexual orientation in the workplace.
- Offensive comments toward any LGBTIQ+ sexual orientation, and acts of discrimination against women and people with diverse identities and/or sexual orientations.
- Suggestive and/or unpleasant remarks, comments about a person's appearance or sexual condition, and deliberate verbal abuse of a lascivious nature.
- Degrading or obscene ways of addressing a person (when this degrading manner includes a comment about their sexual condition or orientation and/or their condition as a woman).
- Questions, descriptions, or comments about sexual fantasies, preferences, and abilities.
- Obscene gestures.
- Deliberately seeking to be alone with the person unnecessarily.
- Invitations or pressure to arrange dates or sexual encounters.
- Demands or requests for sexual favors, whether or not related, directly or indirectly, to career advancement, improved working conditions, or job retention.

- Spreading rumors about a person's sex life.
- Forcing someone to perform activities outside their duties, or other disciplinary measures, for rejecting sexual advances.
- Physical aggression of a sexual nature.
- Using and/or displaying images, graphics, cartoons, photographs, or drawings with sexually explicit or suggestive content.

10. CONDUCT THAT DOES NOT CONSTITUTE WORKPLACE HARASSMENT OR SEXUAL HARASSMENT AT WORK.

- Acts intended to exercise the disciplinary authority that hierarchical superiors legally have over their subordinates.
- The setting of reasonable requirements for work loyalty or corporate and institutional loyalty.
- The issuance of circulars or service memos aimed at requesting technical requirements or improving the efficiency and work performance evaluation of subordinates, in accordance with objective and general performance indicators, provided they are justified and based on non-discriminatory criteria.
- The request to fulfill extra duties of cooperation with the company, when necessary for the continuity of service or to resolve difficult situations in the company's operations.
- Administrative actions or steps aimed at terminating an employment contract, based on a legal cause or just cause, as provided in the Substantive Labor Code.
- The requirement to fulfill the duties of the person and the citizen referred to in Article 95 of the Political Constitution.
- The requirement to comply with the obligations or duties covered by Articles 55 to 57 of the Substantive Labor Code, as well as to avoid the prohibitions covered by Articles 59 and 60 of the same Code.
- The requirements to comply with the stipulations contained in the regulations and clauses of employment contracts.

11. PREVENTION MECHANISMS

- Distribution of this protocol so that all employees are aware of it and take ownership of it.
- Publication, through online media, of information on workplace harassment and sexual harassment at work, describing conduct that may and may not constitute harassment, and the mechanisms available for filing a complaint if any such conduct occurs, in any of its forms.
- Carrying out training and awareness activities on principles, values, diversity, gender equity, and non-discrimination, that facilitate and promote respect and good treatment within the company.

- Establishment and operation of the Workplace Harmony Committee (Comité de Convivencia Laboral) and the Sexual Harassment at Work Response Committee, whose purpose is to propose preventive actions against workplace harassment and sexual harassment at work that help protect employees from psychosocial risks affecting health and well-being in the workplace.
- Promotion of the email address convivencia@grupoargos.com for employees in Medellín, and of the email address convivenciabarranquilla@grupoargos.com for employees in Barranquilla, as a tool of the Workplace Harmony Committee for receiving complaints about situations that may constitute workplace harassment.
- Promotion of the email address acososexual@grupoargos.com as a tool of the Sexual Harassment at Work Committee for receiving complaints about situations that may constitute sexual harassment at work.
- Promotion of the Corporate Code of Conduct as a tool that helps build behavior based on integrity, promoting responsible, honest, upright, serious, and transparent conduct, with respect for the rules and internal policies of Grupo Empresarial Argos.
- Promotion of the Transparency Line as one of the mechanisms of the Corporate Code of Conduct for reporting possible cases of workplace harassment and sexual harassment at work, always guaranteeing confidentiality, due process, and protection guarantees for the reporting party.
- Ongoing review and implementation of best practices regarding the prevention and handling of cases of workplace harassment and sexual harassment at work.

12. RESPONSE MECHANISMS

Workplace Harmony Committee

The Workplace Harmony Committee will be the mechanism responsible for receiving and processing complaints describing situations that may constitute workplace harassment, in accordance with the provisions of Law 1010 of 2006, Resolution 3461 of 2025 issued by the Ministry of Labor, and any other regulation that supplements, amends, or replaces them.

Anyone who turns to this mechanism will receive respectful treatment, always with the intention of finding possible solutions to the conflict; the process will be confidential and kept under seal, and the Workplace Harmony Committee will keep custody of the information and documentation arising during this process.

Complaints received by the Workplace Harmony Committee will be processed in stages, as follows:

First stage: Receipt of the complaint

The employee should try to ensure that as little time as possible passes between the occurrence of the event and the filing of the complaint, which should not exceed five (5) business days.

The Workplace Harmony Committee will receive complaints submitted through written communication addressed to the Workplace Harmony Committee, either using the format established for this purpose or by email containing the same fields requested in that format,

explaining in detail each of the behaviors or situations by which the person considers themselves to have been affected, along with any supporting evidence.

The complaint form or content must be sent by email to: convivencia@grupoargos.com for employees in Medellín, or to convivenciabarranquilla@grupoargos.com for employees in Barranquilla.

Once the secretary of the Workplace Harmony Committee receives the complaint, they will send out the call to an extraordinary committee meeting issued by the chair, which must take place within eight (8) business days following the filing of the complaint.

Second stage: Preliminary assessment

The Workplace Harmony Committee must verify the information in the complaint and review whether the conduct fits within what is set out in Articles 2 or 7 of Law 1010 of 2006. This verification must take place within a period of five (5) to fifteen (15) business days.

To fulfill the function described above, the Workplace Harmony Committee may draw on support from the company's Labor Relations team.

If the Workplace Harmony Committee concludes that the matter does not involve conduct that may constitute workplace harassment, it will inform the interested party of this through a confidential written communication. Otherwise, the Committee must move on to the next stage of the process.

Third stage: Verification and Analysis

Within a maximum period of five (5) business days, the Workplace Harmony Committee must carry out the activities needed to verify, using the evidence in the case, the circumstances under which the events occurred. To do so, it will meet individually with each of the persons involved, both complainants and those complained against, and will record each proceeding in minutes signed by each participant.

The person against whom the complaint is filed must be summoned in order to inform them of the complaint and hear their version of events; the summons must, in addition to the details of the time and place of the meeting, include a summary of the facts on which the complaint is based, in order to guarantee due process to the parties involved.

Fourth stage: Conciliation

Once a full picture of what happened is available, the Workplace Harmony Committee, within a period of five (5) to fifteen (15) business days, will summon complainants and those complained against to a conciliation session in which settlement proposals and commitments are put forward for each party.

These sessions must be conducted after informing those involved that this is a setting aimed at building negotiated solutions that foster a good working environment within the company.

Agreements reached must be documented, and commitments formalized in an action plan, which will be monitored and its compliance verified by the Workplace Harmony Committee.

Fifth stage: Rulings

The Workplace Harmony Committee must issue a ruling on the complaints filed and, in cases where the parties do not reach an agreement, the recommendations made are not followed, or the conduct persists, it will refer the case to the company's senior management so that it can make the appropriate decisions.

Additionally, when no agreement or conciliation is reached, the employee must be informed of the possibility of filing the complaint with the labor inspector or going before the competent judge, in accordance with Resolution 3461 of 2025.

The committee will draw up a document setting out recommendations to the employer, either for informational purposes to monitor the case, or by suggesting adjustments to roles, or with the aim of initiating the corresponding disciplinary procedure if there is evidence of a possible disciplinary offense.

In cases of false complaints, the Committee will determine that no harassment of any kind occurred, will identify the complainant's bad faith, and will proceed in accordance with the company's internal regulations.

Cases will be monitored on a monthly basis. Quarterly reports and a consolidated annual report will also be prepared.

Sexual Harassment at Work Committee

The Sexual Harassment at Work Response Committee will be the mechanism responsible for receiving and processing complaints describing situations that may constitute sexual harassment, in accordance with the provisions of Law 2365 of 2024, and any other regulation that supplements, amends, or replaces it.

Anyone who turns to this mechanism will receive respectful treatment. The process will be confidential and kept under seal, and the information and documentation generated will be kept under the custody of this Committee.

In carrying out its functions, the Committee will act under the following parameters:

- Guarantee victims' rights and provide guarantees of non-repetition regarding sexual harassment, within its area of competence.
- Implement immediate protective measures to avoid irreparable harm, within its area of competence.
- Inform the victim of their right to go before the Office of the Attorney General (Fiscalía General de la Nación), depending on the severity of the reported events.

Complaints received by the Sexual Harassment at Work Committee will be processed in stages, as follows:

First stage: Receipt of the complaint

The committee will receive complaints filed through written communication, either using the format established for this purpose or by email containing the same fields requested in that format, explaining in detail each of the behaviors or situations by which the person considers themselves to have been affected, along with any supporting evidence.

The complaint form or content must be sent by email to acososexual@grupoargos.com.

Once the Committee receives the complaint, it will call an extraordinary meeting, which will take place within eight (8) business days following its filing.

Second stage: Preliminary assessment

The committee must verify the information in the complaint, reviewing whether the conduct fits within what is set out in Law 2365 of 2024. To fulfill the function described above, the Committee may draw on support from the company's Labor Relations team.

If it is concluded that the matter does not involve conduct that may constitute sexual harassment at work, the interested party will be informed of this through a confidential written communication. Otherwise, the Committee must move on to the next stage of the process, which is the corresponding verification and analysis of the facts.

Third stage: Verification and analysis

The committee must carry out the activities needed to verify, using the evidence in the case, the circumstances under which the events occurred. To this end, it will meet individually with each of the persons involved, both complainants and those complained against, and will record each of these proceedings in minutes signed by each participant.

The person against whom the complaint is filed must be summoned in order to inform them of the complaint and hear their version of events; the summons must, in addition to the details of the time and place of the meeting, include a summary of the facts on which the complaint is based, in order to guarantee due process to the parties involved.

Fourth stage: Rulings

The committee must have a maximum period of one month to issue a ruling on complaints, counted from the date they are filed.

While the investigation is underway, the Committee may recommend the adoption of immediate preventive measures aimed at protecting the complainant, such as temporary adjustments to roles, work spaces, or equipment, in order to guarantee a safe environment, prevent retaliation, and prevent situations of revictimization.

Once the situation has been analyzed, the Committee will draw up a document setting out recommendations to the employer, either for informational purposes to monitor the case raised, or by suggesting permanent adjustments to duties, roles, or work spaces, or the opening of the corresponding disciplinary procedure if there is evidence of a possible disciplinary offense.

In any case, the Committee will adopt measures aimed at guaranteeing the protection, safety, and non-revictimization of the affected person. Likewise, the victim must be informed of their right to go before the Office of the Attorney General or other competent authorities, providing them with the necessary guidance on institutional channels of assistance.

In the case of false complaints, it will be determined that no harassment of any kind occurred in the reported situation, and the bad faith of the person who filed the complaint will likewise be determined, and the matter will proceed in accordance with the company's regulations.

Corporate Code of Conduct: Transparency Line

The Corporate Code of Conduct is a tool that helps build behavior based on integrity in accordance with the regulations and internal policies of Grupo Empresarial Argos, and,

accordingly, it also sets out the guidelines for managing and handling improper acts, that is, conduct that is contrary to or carried out in disregard of the guidelines established in the Corporate Code of Conduct and its related policies.

Among the mechanisms supporting the Corporate Code of Conduct to facilitate the adoption of the measures needed to correct improper acts, we have the Transparency Line, an anonymous and confidential mechanism for receiving reports through the phone line 018000126166 or through the email address grupoargos@lineatransparencia.com.

Should a report be filed through the Transparency Line, the procedure set out in Grupo Argos's Transparency Line Investigation Manual is followed, the purpose of which is to ensure that investigations are carried out appropriately, always safeguarding confidentiality and due process.

If the report involves a member of Senior Management, the case must be referred to the Vice President responsible for the Company's compliance functions, who must forward it to the person responsible in accordance with the Investigation Manual, so that the investigations are carried out and the corresponding decisions and corrective measures are issued, guaranteeing proper segregation of duties, independence in decision-making, confidentiality, and protection for the reporting party.

The Corporate Code of Conduct also sets out a statement protecting reporting parties, even if, after the corresponding investigation has been carried out, it is shown that they were mistaken, at all times guaranteeing respect, impartiality, confidentiality, ethics, and integrity in the proceedings.

Effective Date

This protocol takes effect from the moment it is signed and published.

Version, date, and justification

Version	Date	Justification
1	May 7, 2021	Creation of the document
2	July 6, 2026	Update in accordance with Law 2365 of 2024 and Resolution 3461 of 2025, and with the Labor Reform (Law 2466 of 2025)

ANNEX

Form for filing complaints about situations that may constitute workplace harassment and sexual harassment at work	
Name (anonymous complaints are not accepted):	
Identification document:	
Position:	
Email address:	
Phone number:	
Date completed (dd/mm/yyyy):	
In accordance with the provisions of Law 1010 of 2006, I am notifying the company and the Workplace Harmony Committee of a possible case of workplace harassment. This is with the purpose of ensuring that the appropriate steps are taken and that corrective measures are adopted, if applicable.	
Account of the facts constituting the complaint	
Describe all the elements that identify the circumstances of subject, time, manner, place, and any other elements you consider relevant. If deemed necessary, the Workplace Harmony Committee may later request that you expand on the information provided.	
List of evidence to be shared	
Employee's signature:	
Employee's name:	