

# INCLUSIVE CULTURE



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PREPARED BY:	EXTERNAL CONSULTANT
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## INTRODUCTION

Odilo is a diverse and inclusive organisation.

Odilo assumes the importance of adopting good practices by corporate governance as a necessary element, not only for the proper development of its business purposes, but also for the promotion of its social role in D & I.

Therefore, the D & I Body of ODILLO requires the approval of an "Inclusive Culture", as a rule of internal regime that includes the main recommendations on good governance and principles of social responsibility related to D & I, which should guide and inspire the way of action of the management of the entity.

ODILLO's inclusive culture is determined by the vision, mission and strategy established by governance and leadership, and is predominantly influenced by leaders and their approach to developing a diverse and inclusive organisation. It also influences the principles, values, beliefs, behaviors and the expression of the experience lived by the people who work for the organisation or on its behalf.

An inclusive organisation enables fair and equitable access to jobs, careers, learning and development opportunities, and, through its relationships with its staff and other stakeholders, fosters a sense of connection and mutual respect. It is also reinforced through the organisation's D & I framework, policies, processes and practices.

Odilo promotes the professional and personal development of all its employees, ensuring equal opportunities through its policies of action. It does not accept any type of discrimination in the workplace or profession based on age, race, color, sex, religion, political opinion, national ancestry, social origin or disability. In addition, it rejects any manifestation of physical, sexual, psychological, moral or abuse of authority, as well as any other conduct that may generate a discriminatory, intimidating or offensive environment with the rights of individuals.

Odilo is governed by its Statutes, by the regulations that apply to it and by the rules of internal regime approved by the management of the entity. Inclusive Culture is part of these internal rules.



## **APPLICABLE LEGISLATION**

The applicable standard is ISO 30415: Human Resources Management – Diversity and Inclusion.

## **OBJECT**

The Inclusive Culture is called to develop and formalise the mission and principles that serve as a guide for the action of the members of the management of the entity in the planning and execution of all those activities through which the ends of this are materialised.

In the Inclusive Culture, the main recommendations on the good governance of entities and principles of responsibility with respect to D & I are included.

The Inclusive Culture of ODILO aims to establish the guidelines of conduct that must govern the ethical behavior in D & I of all its managers and employees in their daily performance and in the relationships and interactions that the entity maintains.

In addition to the persons mentioned above, there are suppliers and customers, to the extent that they relate to the entity.

Odilo understands that the procedures he has implemented allow him to respond to the D & I objectives set out above.

The Inclusive Culture of ODILO is aimed at all personnel linked, temporarily or indefinitely, to the entity, regardless of the position they occupy relative to their job.

The guidelines provided for in this Inclusive Culture are mandatory. These guidelines establish clear principles of action that guide the behavior of staff during the performance of the professional activity.

On the other hand, ODILO will promote and encourage among its suppliers, external collaborators, temporary or permanent, the adoption of patterns of behavior alienated with those defined in this Inclusive Culture.

## GUIDING PRINCIPLES

The principles that govern this Inclusive Culture are based on the inclusion of diversity in the workplace, and therefore in the professional performance of employees.

The inclusion of diversity, in this case, is understood as the creation of an inclusive workplace, which requires a continuous commitment on the part of the entity, addressing inequalities in the systems, policies, processes and practices of the organisation. Professional responsibility is understood as proactive, efficient and focused on excellence, quality and the will of service.

The following are the principles and objectives of Diversity and inclusion for the achievement of favorable results of the Inclusive Culture:

- The strategic objectives of the organisation support the vision, mission and values of the organisation, resulting in positive and measurable results for people and the organisation.
- Leaders are committed to D & I, and demonstrate this in behaviors that build trust and challenge prejudice and discrimination.
- Opportunities are provided to all staff members to reach their full potential.
- Collaboration and knowledge sharing are valued as standards.
- People have a voice, dialogue is encouraged and diverse perspectives are respected and embraced.
- The intersectionality of the dimensions of diversity is recognised;
- People feel welcome, have a sense of belonging, contribute and participate.
- Improved organizational engagement is reflected in the way people value and respect each other.
- Problem solving and decision-making, creativity and innovation are improved.
- A safer working environment is achieved and incidents of complaints, claims and risks are identified and addressed.
- The organisation has a positive reputation as an inclusive employer and preferred place to work; Y
- Improves service delivery and relationships with external stakeholders.



Odilo expects from all the people to whom this Inclusive Culture is directed, a behavior according to these principles and objectives mentioned.

## **LEGALITY**

Odilo is committed to complying faithfully and respectfully with all legal obligations to which it is subject in D & I matters.

## **COLLABORATION**

In achieving its objectives, ODILO may collaborate with other entities, companies and institutions, public or private, in order to achieve a greater social impact on D & I through its activities.

## **GUIDELINES OF CONDUCT**

The Inclusive Culture determines specific guidelines for action, again, specified in ISO 30415-Human Resources Management: Diversity and inclusion.

- Prioritise and promote D & I principles and objectives through communications, engagement and outreach activities, HR lifecycle policies, processes and practices, and relationships with all stakeholders;
- Ensure the application of ethical and regulatory considerations in the collection, interpretation and use of data;
- Encourage individuals to disclose their demographic data by explaining to them that data will be used to improve systems, policies, processes and practices, as well as to identify and address disparities, and that ethical and normative considerations are applied to their collection, interpretation and use;
- Provide mechanisms for people to express their views and make suggestions for change on D & I in the organisation, for example in focus groups, surveys, suggestion schemes and other stakeholder feedback methods that encourage dialogue and debate;
- Communicate behavioural expectations that promote the importance of inclusive and respectful behaviour;



- Provide mechanisms to identify, examine and resolve workplace conflicts and ensure that they are properly used to address individual concerns, e.g. interpersonal interactions and outcomes, intimidation, harassment and microaggressions, as well as any forms of retaliation;
- Gather information on the work culture of individuals, ERG, discussion groups, committees and working groups, workers' representatives, works councils and trade union representatives, where they exist;
- Collect data by diversity dimension on workers' health, safety and well-being, including absenteeism, turnover and staff retention, to identify adverse trends and impacts;
- Collect data by diversity dimension related to workplace conflicts, such as incidents, disputes, discipline and complaints, reports of intimidation, harassment and microaggressions, forms of retaliation, as well as resolution results to identify adverse trends and impacts;
- Use internal and external comments, requested and unsolicited, to learn about the organisation's reputation as an integrative organisation; Y
- Report on the development of an inclusive organizational culture, staff composition, D & I opportunities and risks and action plans.

## **ETHICAL CHANNEL**

Odilo has chosen to create an email address: [politicaanticorruccion@odilo.us](mailto:politicaanticorruccion@odilo.us) for sending/receiving complaints by its employees and other interested parties in matters of exclusion or discrimination of diversity.

The sending will be made through a direct email to the aforementioned email address or through the mailbox established on the ODILLO website for this, which will be available permanently to both employees of the entity and to the rest of the interested parties.

Access to this enabled email address will only be allowed to him/her/the secretary of the D & I Body, who will access it with a password known only to him/her. In the case of an obligation by legislation on data protection, it will be followed for compliance, which may affect the complaints channel procedure.





Confidentiality, anonymity, and non-retaliation against whistleblowers will be guaranteed, so that only the contents of the form, transcribed by him/her, will be reported to the D & I Body, without indicating any personal information or the mail of the person submitting the form.

Once reported to the D & I Body for the evaluation of the content, the email that includes the information that is reported will be deleted from the mailbox of the complaint channel.

Through a follow-up of the complaints received, and their subsequent referral to the D & I Body, reports are made of the activity of the channel showing the number of complaints sent, opened, completed, etc. categorised by gender, race, age, disability, etc.

### **COOPERATION AND DEDICATION**

Odilo provides an environment of cooperation and teamwork for a better use of all capacities and resources.

All persons within the scope of the Inclusive Culture should act in a spirit of collaboration, making available to the other organizational units the knowledge or resources that may facilitate the achievement of their D & I objectives and interests.

### **IMAGE AND CORPORATE REPUTATION**

Odilo believes that one of the basic elements that contribute to its corporate image and reputation is the establishment of responsible citizenship relationships in D & I matters in those communities in which it carries out its activity.

Odilo sees its corporate image and reputation as one of its most valuable assets to preserve the trust of its associates, employees, suppliers, authorities, and civil society at large.

All employees must take utmost care to preserve the image and reputation of the entity in all its professional actions. Likewise, they will monitor the respect and correct and appropriate use of the corporate image and reputation by the employees of suppliers and collaborators.



## **ACCEPTANCE AND COMPLIANCE WITH INCLUSIVE CULTURE**

This Inclusive Culture is mandatory for all employees of ODILO, its associates, collaborators, and those third parties who have voluntarily assumed it in their relations or contracts with ODILO.

Odilo will insert it for dissemination on its website and would make it known to those people or entities with whom it relates and for which its content is relevant.

Employees must formally commit to the fulfillment of the Inclusive Culture at the time they cause registration in the entity, incorporating compliance with the principles of the entity into their employment contracts.

In addition, ODILO may periodically require the persons included in its scope of application to formally state that they know and comply with the guidelines of conduct established in the Inclusive Culture and to carry out training sessions on the different aspects of it. In addition, a procedure will also be carried out on a regular basis that gathers the views of the persons within this scope of application on D & I in the workplace.

Non-compliance with this Inclusive Culture will be analysed in accordance with the internal procedures, the legal regulations and the specific one, and where appropriate, the appropriate penalties will be applied.

No one, regardless of their level or position, is authorised to request an employee to contravene the provisions of this Inclusive Culture.

Non-compliances with the Inclusive Culture put ODILO's reputation at risk, and could compromise its strength. For this reason, all persons within its scope have the obligation to inform their hierarchical superior, or through the Ethics Channel, of any non-compliance or malpractice in D & I that they may observe in the performance of their professional activities.

## **VALIDITY AND MODIFICATIONS**

The Inclusive Culture enters into force on the day of its insertion on the website of the entity and will be in force as long as its modification or cancellation is not approved.



This Inclusive Culture will be reviewed and updated as appropriate, taking into account the suggestions and proposals received through the Complaints Channel and the procedures for collecting opinions. The modification of the Inclusive Culture will require the agreement of the responsible of D & I.