

D & I Framework



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POLICY STATEMENT

The purpose of this Diversity and Inclusion Policy (D & I) is to express ODILLO's willingness to establish a work environment that enhances equal opportunities and the inclusion of diversity, through principles such as non-discrimination, defining for this a framework of principles of compliance in D & I.

Odilo makes it a priority not to tolerate within the entity any discriminatory conduct based on age, disability, sexual orientation, gender or identity, race, nationality, ethnic origin, religion or belief, characteristics related to the socio-economic context, or any other characteristic that may be subject to discrimination, and that constitutes a breach of the D & I Policy.

Therefore, the maximum commitment by the ODILLO Management, as well as that of all members of the organisation, is required to comply with its provisions.

Based on this commitment, the parameters of behavior that are expected of the subjects affected by this document are established, describing the measures taken to monitor this mandate and the consequences in case of non-compliance.

- The applicable legal requirements are met.
- Procedures are established to comply with the D & I Policy.
- Each employee is responsible for complying with this Policy and its procedures as applicable to their job.
- It is ODILLO's duty to implement, maintain and monitor the Diversity and Inclusion Management System (SGD &I).

Entities and persons concerned

This Policy is mandatory and of global application to the entity.

All members of the organisation must comply with its content, actively participating in the creation of an inclusive, equal and free of discrimination work environment, regardless of the position they occupy and the territory in which they are located.



Because of the above, this Policy may also be extended to collaborating entities in order to ensure regulatory compliance.

Objetivos

A D & I Policy is a supporting structure of interrelated components, which the organisation employs to contextualise, manage and promote inclusion in a strategic and interfunctional way. In order to achieve the objectives and commitments set out in D & I, ODILO proposes:

- Appoint the person responsible for ODILO's D & I who will ensure the relevance, development and maintenance of the Policy;
- Ensure that the leaders of the ODILO organisation articulate their commitment to sponsor, develop and maintain an inclusive organisation;
- Integrate the principles and objectives of D & I into the policies, processes and practices of the organisation;
- Identify the D & I measures that are important to the organisation and use aggregated and segmented data from the workforce and other stakeholders to assess progress;
- Inform the staff of ODILO, and the collaborating entities that relate to it, about the objectives of the D & I Policy and the opportunities to contribute to them;
- Align departmental, group, team and individual objectives with D & I objectives
- Identify, monitor and address D & I risks, challenges and limitations, and optimise their opportunities;
- Review plans, systems, technologies, policies, processes and practices to ensure that they are fair, equitable, and do not harm individuals, including those related to the use of automated technologies and systems;
- Collect data on staff and other stakeholders' perceptions about the organisation's commitment to diversity and inclusion, e.g. from focus groups, surveys, interviews and external reviews;
- Review the results and impacts of D & I related to the acquisition and delivery

of goods and services and interactions with external stakeholders;

- Periodically review D & I's objectives to ensure alignment with the organisation's vision, mission and strategy, as well as its organizational context;
- Report regularly on progress in achieving the organisation's D & I objectives through an Annual Report.
- To transmit to all employees, managers of ODILO, and the collaborating entities that relate to it, the message that the entity ensures that its activity is based on respect for the laws and regulations in force at all times, as well as in the promotion and defense of its D & I values and principles of action established in its Inclusive Culture. Therefore, it links with its ethical values, confirming the firm will to maintain exemplary D & I conduct.
- Establish a general framework for the diversity and inclusion model of the entity, adapting it to the new regulatory provisions. The Model comprises the set of measures aimed at preventing, detecting and reacting to discriminatory behaviours and identifying the risks and controls associated with them that are established.
- Assure customers and suppliers that ODILO complies with the duties of supervision and control of its activity, establishing appropriate measures to prevent or reduce the risk of non-compliance in D & I and that, therefore, due control is exercised, legally appropriate, over managers, employees, and other associates.

The objectives of the D & I Policy refer to demonstrating ODILO's commitment to D & I, and to developing an inclusive organisation.

The body responsible for carrying out the objectives is the D & I Body, supervised by ODILO's D & I Manager.

The results will be evaluated along with the procedure of metrics and indicators and the continuous improvement procedure for the evaluation of the results to show the effectiveness and efficiency of the D & I system and the levels of implementation and maturity achieved.



Principles

Our teams are made up of people from different profiles, cultures, backgrounds and experiences, including diversity factors such as: gender, gender identity and expression, race, ethnicity, age, education, socioeconomic class, disability, religion, sexual orientation, etc.

We recognise that people are unique because of our differences and similarities, and we firmly believe that having diverse talent allows us to better understand and understand the diversity of our own clients and the communities with which we relate.

Our organisation also advocates for a culture of inclusion, equality and respect. We favor equitable work environments in which each person can achieve their goals and develop, promoting an environment of understanding and acceptance in which everyone can develop their talent every day.

In our entity, we maintain a policy of zero tolerance for all types of discrimination. This Policy governs all actions that ODILO provides in its services contracted by clients, particularly in terms of human resources: recruitment and selection of candidates, remuneration and benefits, promotions, transfers, professional development and training, graduations, and other disciplinary measures, among others.

The principles governing this Policy and, consequently, the DGS & I are as follows:

- 1.** Recognising diversity: Value all people intrinsically, individually and as groups, appreciate how the different dimensions of diversity intersect, and recognise that demographic characteristics and other personal characteristics can be protected by law and regulations.
- 2.** Act in accordance with the current legislation on D & I, the Inclusive Culture and the rest of the internal regulations.
- 3.** Govern effectively: Exemplify and promote leadership engagement with D & I through the use of inclusive organizational governance systems, policies, processes, practices and operations.
- 4.** Acting responsibly: To act ethically and socially responsible by promoting

productive employment and decent work for all.

5. Work inclusively: Create and develop an accessible and respectful work environment that encourages inclusion and a sense of belonging.
6. Communicate inclusively: Recognise and respond to the needs of people who access, understand and relate to communications in different ways.
7. Defending and promoting diversity and inclusion: Actively influence and promote inclusive organisational practices and stakeholder relationships.
8. The existence of effective, permanent and up-to-date control systems at all times.
9. The establishment of internal rules and procedures for action and decision, aimed at preventing persons under the scope of the Policy from having decision-making powers not subject to control.
10. Ensure adequate resources and means for the implementation of this Policy in order to prevent or detect possible regulatory breaches.
11. Carry out training activities that are appropriate and proportionate, with sufficient frequency to ensure the updating of their knowledge in this field and the development of an Inclusive Culture in D & I and compliance with the Law.
12. Transmit the responsibility of all natural or legal persons under the scope of this Policy with respect to the monitoring of conduct contrary to D & I from the perspective of regulatory non-compliance. In particular, those persons in charge of employees or work teams shall ensure that discriminatory behaviour is prevented and shall ensure that they have recourse as soon as possible and diligently to the bodies and processes established as soon as they are detected.
13. Transmit and maintain a culture of compliance that, with due guarantees of confidentiality and protection of the whistleblower, favors the communication of possible discriminatory acts with regulatory significance, through the internal channels established for this purpose, to the body

responsible for monitoring the operation and observance of the DGS & I.

14. Investigate as soon as possible detected facts, allegedly discriminatory, guaranteeing the rights, in any case, of the persons investigated, as well as of the complainant, if any.
15. Apply the disciplinary regime to internal non-compliances linked to possible discriminatory acts in accordance with the internal and legal regulations of application.

Related D & I Actions

Organisational measures – D & I body

Odilo creates a D & I Body, consisting of a Director and 2 Vocals.

1) Director

Legal, Internal Operations

The choice of a person responsible for D & I must be approved by the entire D & I Body. The head of D & I is endowed with autonomous powers of initiative and control, as well as the maximum possible independence to develop its contents.

2) Vowels

- **Vowel:** Business Manager
- **Vowel:** Manager Internal Operations

As established by ISO 30415, D & I responsibilities should be delegated to people with experience and knowledge in the field. Individuals with delegated responsibilities for D & I, people management and stakeholder relationships are responsible for planning, implementing and monitoring policies, processes and practices, as well as reviewing their effectiveness in achieving D & I objectives.

For this reason, this person responsible for D & I will delegate and divide his/her responsibilities into the VOCALS.



This delegation does not exempt the person responsible for D & I from his or her own duties and responsibilities regarding the management of human resources and the provision of services to external D & I entities.

Roles and Responsibilities

The responsibilities of the person **responsible for D & I, which will also apply to senior management**, shall include, but not limited to, the following:

- Establish D & I principles and objectives and a support framework to make them a reality.
- Facilitate an inclusive organizational culture by establishing D & I expectations and responsibilities, communicating them to all stakeholders and fostering inclusive relationships and shared values with them.
- Demonstrate your commitment to inclusive culture, setting behavioral expectations for the workforce, challenging and addressing inappropriate behaviors, and recognising and rewarding inclusive D & I practices and behaviors.
- Assign responsibility for achieving D & I objectives to those who direct the functional areas of the organisation.
- Ensure that the organisation's systems, policies, processes and practices in all functional areas conform to its D & I principles and objectives.
- Allocate resources to achieve D & I objectives, for example by sponsoring initiatives, erg and steering committees, including allocating time and support to participate and contribute to the achievement of D & I objectives.
- Review the outcome and impact of its products and services on market segments and as many stakeholders as possible.
- Ensure that the organisation's annual report includes a clear narrative description of its D & I opportunities and risks, as well as progress towards the D & I objectives, supported by strong evidence and demographic data from its workforce.

The responsibilities of the **D & I Body** shall include, but not limited to, the following:

- Ensure that D & I principles are integrated into the entity's functional systems, policies, processes and practices.
- Share knowledge, skills and experience in the field of diversity and inclusion, and defend and guide policies, processes and practices that promote inclusive culture.
- Deploy resources to respond to opportunities, risks, limitations and challenges in order to achieve D & I goals.
- Ensure that policies, processes, practices and decisions about people, as they enter, pass and leave the organisation, are evidence-based and supported by checks and balances to mitigate the effects of prejudices, including those of existing and emerging technologies.
- Promote the organisation's D & I principles and objectives through all stages of the human resource management lifecycle.
- Create a safe environment to raise diversity and inclusion issues, concerns and complaints, and ensure that policies, processes and practices are applied fairly to all stakeholders, including whistleblowers.
- Ensure that stakeholders' views are taken into account when monitoring the implementation of policies, processes and practices to identify diversity and inclusion impacts, outcomes, challenges, constraints and trends.
- Promote the organisation's D & I principles and objectives through procurement agreements with the supply chain, relationships with customers and communities, and other external stakeholders.
- Identify and analyse diversity data to measure impacts.
- Identify the criteria and associated D & I measures that are important to the organisation.
- Assess the impact of policies, processes and practices on the development



of an inclusive workplace, including the movement of people to, through and outside the organisation, and other stakeholders; Y

- Review and report on the status and progress in relation to the identified D & I objectives, including the assessment of risks and opportunities, and any recommendations for change and inclusion in the organisation's annual report.

Obligations of the members of the organisation

To the extent that compliance with the law and proper development of the SGD & I is the responsibility of all members of the organisation, they are expected to:

- Ensure compliance with those established in these documents, observing an Inclusive Culture and contrary to discrimination.
- Please immediately respond to any information you may receive from the D & I Body in the performance of the functions described above.

All members of the entity are responsible for understanding, observing and applying the provisions of this Policy, collaborating with the D & I Body and with the D & I manager, where necessary.

In addition, they must immediately communicate, through the established internal channels, any action or conduct of which they are aware in order to avoid or remedy the commission of a breach, and they will be guaranteed confidentiality and non-retaliation against them by ODILO.

All members are expected to adhere to this Policy, and to the ethical values it represents, and to attend the training sessions.

Knowledge and declaration of conformity

This Policy is delivered and available to all interested parties of the entity through the ODILO website.

Legal and regulatory requirements

According to current legislation, the laws applicable to ODILO regarding D & I are:

International Organisations

- Universal Declaration of Human Rights. United Nations General Assembly Resolution 217 A (III) of 10 December 1948.
- International Covenant on Economic, Social and Cultural Rights. General Assembly resolution 2200 A (XXI) of 16 December 1966.
- C100 Equal Remuneration Convention, International Labour Organisation, 1951.
- C111 Discrimination (Employment and Occupation) Convention. International Labour Organisation, 1958.
- International Covenant on Civil and Political Rights. 1976,
- United Nations Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) General Assembly Resolution 34/180 of 18 December 1979.
- Convention for the Protection of Human Rights and Fundamental Freedoms and Additional Protocols. Adopted by the Council of Europe on 4 November 1950.
- Treaty on the Functioning of the European Union and Charter of Fundamental Rights of the European Union.
- Charter of Fundamental Rights of the European Union.

European Directives

- Council Directive 79/7/EEC of 19 December 1978 on the progressive implementation of the principle of equal treatment for men and women in matters of social security.
- Council Directive 92/85/EEC of 19 October 1992 on the introduction of measures to encourage improvements in the safety and health at work of pregnant workers, workers who have recently given birth or are breastfeeding.

- Directive 2006/54/EC on the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation (recast).

Other documents of interest

- Council conclusions of 7 March 2011 on the European Pact for Gender Equality.
- Strategic commitment for equality between women and men 2016-2019.
- European Pact for Gender Equality 2011-2020 (2011/C 155/02).
- Gender Equality Strategy 2018-2023 Council of Europe.
- European Women's Charter (COM/2010/0078 final).
- Recommendation CM/Rec (2019)1 of the Committee of Ministers to the Member States to prevent and combat sexism.

National regulations

- 1978 Spanish Constitution
- Decree 902/2020 of 13 October 2020 on equal pay between women and men.
- Consolidated document on measures of the State Pact on Gender-Based Violence.
- Instrument of ratification of the Council of Europe Convention on preventing and combating violence against women and domestic violence, done in Istanbul on 11 May 2011.
- Law 11/2018, of 28 December, amending the Commercial Code, the consolidated text of the Law on Companies of Capital approved by Royal Legislative Decree 1/2010, of 2 July, and Law 22/2015, of 20 July, on Auditing Accounts, on non-financial information and diversity.

- Law 15/2022, of 12 July, integral to equal treatment and non-discrimination.
- Law 23/2015 Archive 21 July, Authorising the Labour and Social Security Inspection System.
- Law 30/2003, of 13 October, on measures to incorporate the assessment of gender impact in the normative provisions drawn up by the government.
- Law 39/1999 of 5 November 1999 to promote the reconciliation of work and family life of working persons.
- Law 4/2023, of 28 February, for the real and effective equality of trans persons and for the guarantee of the rights of LGBTI persons.
- General Disability Act (LGD): Royal Legislative Decree 1/2013 of 29 November 2013 approving the revised text of the General Law on the Rights of Persons with Disabilities and their Social Inclusion.
- Organic Law 1/2004 of 28 December on Comprehensive Protection Measures against Gender-Based Violence.
- Organic Law 1/2004 of 28 December on Comprehensive Protection Measures against Gender-Based Violence.
- Organic Law 3/2007 of 22 May 2007 for the effective equality of women and men.
- Order PCM/1047/2022, of 1 November, approving and publishing the procedure for the valuation of jobs provided for in the Royal.
- Royal Decree 850/2015 of 28 September 2015 amending Royal Decree 1615/2009 of 26 October 2009 regulating the granting and use of the 'Equality in the Enterprise' badge.
- Royal Decree 901/2020 of 13 October 2020 regulating equality plans and their registration and amending Royal Decree 713/2010 of 28 May 2010 on the registration and deposit of collective labour agreements and agreements.
- Royal Decree 901/2020 of 13 October 2020 regulating equality plans and

their registration and amending Royal Decree 713/2010 of 28 May 2010 on the registration and deposit of collective labour agreements and agreements.

- Royal Decree 902/2020 of 13 October 2020 on equal pay between women and men.
- Royal Legislative Decree 2/2015 of 23 October 2015 approving the consolidated text of the Workers' Statute Act.
- Royal Legislative Decree 5/2000 of 4 August 2000 approving the consolidated text of the Law on Offences and Sanctions in the Social Order.
- Royal Legislative Decree 5/2015 of 30 October 2015 approving the consolidated text of the Law on the Basic Statute of Public Employees.
- Royal Legislative Decree 8/2015 of 30 October 2015 approving the consolidated text of the General Law on Social Security.
- Royal Decree-Law 12/2020 of 31 March 2020 on urgent measures to protect and assist victims of gender-based violence.
- Royal Decree-Law 6/2019 of 1 March 2019 on urgent measures to guarantee equal treatment and opportunities between women and men in employment and occupation.
- Royal Decree-Law 6/2019 of 1 March 2019 on urgent measures to guarantee equal treatment and opportunities between women and men in employment and occupation.
- Consolidated text of Organic Law 4/2000 of 11 January 2000 on the rights and freedoms of foreigners in Spain and their social integration.

RISK ANALYSIS AND MANAGEMENT

The activities, criteria and responsibilities for carrying out the analysis of threats and opportunities and managing them are regulated in a procedure.

The SWOT analysis consists of: Weaknesses, threats, strengths and opportunities.



Strengths are all those internal and positive elements that can differentiate ODILLO from other entities.

Weaknesses are all those internal and negative elements that constitute barriers to prevent regulatory breaches.

Opportunities are external elements that involve changes in the environment, which if taken advantage of can improve the competitive situation of the company.

Threats are external elements that involve changes in the environment, which if not faced in time can put the company at a competitive disadvantage.

The conclusions of the previous identification of factors will be included in a record, according to their scores.

From the SWOT matrix, conclusions can be drawn and the most appropriate strategy can be defined according to the characteristics of the institution.

COMMITMENT TO CONTINUOUS IMPROVEMENT

Odilo undertakes to develop a continuous improvement procedure in order to analyse the activities, criteria and responsibilities to ensure that the efficiency and effectiveness of the DGS & I is continuously increased, that the causes that give rise to Non-Conformities are detected, and the appropriate actions are decided to eliminate or prevent them.

The procedure will be oriented around:

- The corrective actions that are applied to the appearance of significant Individual Non-Conformities.
- Preventive actions that are applied to avoid the appearance of future non-conformities.
- Any improvement actions that may be revealed as a result of ODILLO's analyses of the various sources of information at its disposal any questions relating to this D & I Policy may be addressed to the D & I Body via e-mail: politicaanticorruccion@odilo.us



In addition, the entity has a communication channel to ensure compliance with this Policy and to receive and respond to comments, doubts or complaints made in good faith, regarding its interpretation, application or compliance.

COMPLAINTS CHANNEL

Odilo has chosen to create an email address: politicaanticorrupcion@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, 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.

CONSEQUENCES OF NON-COMPLIANCE

Failure to comply with the principles, rules, policies and protocols set out in this Manual may result in labour sanctions against ODILLO staff, without prejudice to any administrative or criminal penalties that may apply.



The only body competent for the imposition of disciplinary sanctions is the head of the entity.

The procedure to be followed for the imposition of disciplinary sanctions, as well as the initiation and development, where appropriate, of the corresponding disciplinary proceedings, or for the imposition and communication of the penalty, shall be governed by the provisions of the Workers' Statute, the applicable Collective Agreement and the internal agreements with the corresponding workers' representatives, if any.

The disciplinary system can only reach employees, that is, people linked by some type of employment relationship.

The penalties that may be imposed will depend on the seriousness of the misconduct, as well as other factors such as the repetition of the infringement, the recidivism or the entity of the damages in your case.

In either case, the burden of proof of the employment offence justifying the dismissal or disciplinary penalty shall be borne by the entity.

With regard to the limitation of offences and misconduct, the provisions of the collective agreement, the Workers' Statute and the other applicable legislation shall be complied with.