

POLICY FOR THE PREVENTION AND COMBATING OF HARASSMENT IN THE WORKPLACE

1. PRESENTATION

This policy must be read and interpreted along with the Code of Ethics and Conduct, as it forms an integral part of the policies and regulations under FAPEX Compliance Program.

2. OBJECTIVE

This policy aims to establish guidelines for the prevention and combating of all forms of harassment, promoting a safe and respectful work environment, free from any inappropriate or abusive behavior.

3. SCOPE

This policy applies to all employees, project coordinators, interns, scholarship holders, trainees, as well as suppliers and other partners with whom FAPEX maintains professional relationships.

4. RESPONSIBILITIES

All employees, regardless of their position or role, are responsible for maintaining a workplace free from harassment and for contributing to a respectful and healthy organizational climate.

FAPEX Management is responsible for ensuring compliance with the guidelines set forth in this policy, as well as promoting the well-being of their teams and promptly reporting any violations to the Compliance Office.

5. DEFINITIONS

The terms used in this policy shall be interpreted based on the definitions provided below:

Harassment: Any abusive conduct that may be expressed via words, behaviors, acts, gestures, or written communication that may cause harm to a person's personality,

dignity, or physical or psychological integrity; endanger their employment; or degrade the work environment.

Moral Harassment: The repeated and prolonged exposure of individuals to humiliating and embarrassing situations in the workplace in the course of performing their duties.

Sexual Harassment: Conduct of a sexual nature, manifested via words, gestures, or other means, proposed or imposed on a person against their will, causing embarrassment and aiming to obtain sexual advantage or favors.

CIPA: Internal Committee on Accident and Harassment Prevention.

6. GENERAL GUIDELINES

FAPEX is committed to maintaining a healthy and safe work environment in compliance with applicable legislation, in which all employees are treated with respect and dignity, and are guaranteed privacy, the right to a fair defense, equal treatment, and without discrimination or undue privileges.

The Foundation does not tolerate inappropriate workplace behavior such as moral or sexual harassment, threats, intimidation, or extortion in its professional relationships at any hierarchical level. Any such behavior shall be addressed in accordance with applicable legislation.

We are committed to fostering and strengthening a welcoming, efficient, humanized, and sensitive environment (Ombudsman Office) in which victims feel safe to report incidents without fear of retaliation.

6.1 MEASURES TO PREVENT AND COMBAT HARASSMENT IN THE WORKPLACE

- i) Promote periodic awareness campaigns and ensure their content is broadly shared with all employees;
- ii) Conduct training, guidance, and awareness activities at least once every twelve (12) months on issues related to violence, harassment, equality, and diversity in the workplace for all employees;
- iii) Widely publicize the Ombudsman Office channel as the appropriate means for receiving and monitoring complaints;
- iv) Include topics related to harassment prevention and combating in the activities of the CIPA;

v) Ensure that all reports received are investigated respecting the rights of all parties involved, including the right to a fair defense, privacy, and proportionality.

6.2 CONSEQUENCES AND PENALTIES

Employees who become aware of any inappropriate conduct by any individual are encouraged by FAPEX to promptly report it to the Ombuds Office for investigation and appropriate action. Anonymity is guaranteed.

Any failure to comply with this policy, whether by action or omission, will be treated with utmost seriousness. All parties involved are subject to disciplinary, contractual, and administrative sanctions, in addition to any applicable civil or criminal liability.

7. FINAL CONSIDERATIONS

This policy shall enter into force on the date of its issuance.

It will be reviewed periodically to ensure it remains up-to-date and aligned with the best practices and applicable laws.

REFERENCE DOCUMENTS

Law No. 14,457 of September 21, 2022 (Emprega + Mulheres Program);

FAPEX Code of Ethics and Conduct

**LET IT BE RECORDED, PUBLISHED AND COMPLIED WITH.
EXECUTIVE BOARD, JANUARY 14, 2025.**



Antonio Fernando S. Queiroz
Executive Director



Rosalba Oliveira
Superintendente
Rosalba Silva Oliveira
Superintendent