

1 Purpose

Techint E&C is an employer that provides equal opportunities and seeks to foster a work environment that may attract and develop talents of all genders, nationalities, generations, cultures, religions and background, always respecting and appreciating individual differences.

Pursuant to this commitment, Techint E&C will treat all its employees, as well as potential employees, with equity and always focusing on individual merit. In addition, it will not tolerate any type of Discrimination or Harassment in its work environment.

Employees are entitled to work in an environment free from Discrimination and Harassment, including sexual harassment, and from any other type of offensive behavior.

Techint E&C expects its employees to interact with each other and with anyone doing business with the Company, Subsidiaries or Affiliates, with politeness, respect and dignity, regardless of the hierarchy or contractual conditions, inside or outside the workplace.

Techint E&C also commits to provide reasonable comfort to people with disabilities and also to people of all religious beliefs and practices, according to the applicable law.

2 Scope

This Policy applies to all employees, contractors, subcontractors, commercial intermediaries, suppliers, consultants, partners and any party providing services for or on behalf of Techint E&C S.A. and/or companies controlled either directly or indirectly by Techint E&C (all of them jointly referred to as the "Companies").

3 Implementation and Monitoring

3.1 Definitions

Techint E&C prohibits all types of Discrimination and Harassment.

"Discrimination" in the work environment includes (a) any favoritism, exclusion or preference made on the basis of race, color, sex, religion, political opinion or social origin, that may negate or impair equal opportunities or equal treatment in the job or occupation; and (b) any other favoritism, exclusion or preference that may negate or impair equal opportunities or equal treatment in the job or occupation according to the applicable law. Any favoritism, exclusion or preference related to a particular job that is based on the requirements inherent in the job is not considered to be Discrimination.

"Harassment" consists in an inappropriate offensive behavior by one person to another in the workplace, which such individual knew or should have reasonably known that would cause offense or damage to the other person. It includes objectionable acts, comments or manifestations that belittle, disdain or cause personal humiliation or shame, or any act of intimidation or threat. It also includes harassment due to race, color, physical characteristics, national origin or ethnic origin, religion or beliefs, sex (including pregnancy, delivery or related medical condition), gender or sexual orientation, age, civil or partnership status, family condition, political or any other opinions, economic status or any other cause prohibited by the applicable laws.

In general, harassment consists in a series of incidents but it may also refer to a single serious incident with a long-lasting impact on the person.

Even though there is not an exhaustive list of conducts that might be defined as Harassment and the applicable law may vary from country to country and from state to state, there follow some examples of forbidden behaviors:

- *Sexual harassment*: Unwelcome sexual advance, requests for sexual favors and verbal, non-verbal¹ or physical conduct of a sexual nature that may interfere with an individual's work performance or that may create an intimidating, hostile, degrading or sexually offensive work environment;
- *Bullying*: A repeated pattern of incidents or behaviors that intimidates, belittles, humiliates or embarrasses a person or a group of persons. Bullying may include actions, comments, manifestations and cruelty, and involves underestimating, denigrating, spreading rumors or gossip, and damaging a person's reputation.
- *Other types*: Expression of hostility or aversion towards a person that creates a hostile, degrading, humiliating or offensive work environment that unreasonably interferes with a person's performance or behavior at work or which, otherwise, impacts adversely on his/her work opportunities, including physical violence or intimidation, public humiliation, persecution, racist/homophobic insults, lurking, sending of racially offensive or disdainful messages by resorting to any system, method or device, as well as ridiculing or making fun of a person, added to any other physical or verbal offensive behavior.

Regardless of the specific legal definitions of harassment and sexual harassment, if the behavior of an employee (or the behavior of another person such as a contractor, subcontractor, commercial intermediary, supplier, consultant, partner or any other person providing services for or on behalf of Techint E&C) might be inappropriate or offensive for another person, then such conduct could be interpreted as inappropriate in a work relationship.

It is strictly forbidden for the employees of Techint E&C to harass other employees or third parties, such as clients, suppliers or external contractors with whom they are in contact during, or as a result of, the jobs they perform.

3.2 Main Responsibilities

All employees are responsible for:

- Understanding this policy and complying with it;
- Cooperating to keep a respectful work environment;
- Contacting and reporting to their Chief, the Human Resources Department, the Internal Audit Department or the Compliance Line (<https://www.bkms-system.com/TechintEC>) any case of harassment or discrimination that they may have personally experienced or witnessed, and also if they have questions or enquiries in this respect.

All Chiefs are responsible for:

- Promoting a work environment free from discrimination and harassment;
- Notifying immediately to the Human Resources Department, the Internal Audit Department or the Compliance Line (<https://www.bkms-system.com/TechintEC>) any case of discrimination or harassment they have experienced, or any report of discrimination or harassment they have received.

¹ Examples of non-verbal conduct are: display of sexually explicit material or sexually suggestive material, sexually suggestive gestures, catcalls, ogling.

The Human Resources Department is responsible for:

- Monitoring the implementation and communication of this Policy, ensuring that appropriate training is provided to employees of Techint E&C;
- Notifying immediately to the Internal Audit Department any incident reported, and coming to an agreement about which of both sectors shall investigate the issue, taking into account the seriousness of the incident, the legal requirements and the availability of resources for such purpose;
- Taking corrective measures in coordination with the Legal Service of Techint E&C and the Management Office of the area involved of Level 4 or higher, if applicable;
- Reporting to the superiors of the employee the cases of harassment or discrimination whenever the seriousness of the offense warrants such an action.

The **Human Resources Department and the Internal Audit Department** shall investigate any incidents involving a violation of this Policy that are reported to any of them, according to the rules jointly agreed upon by both departments.

The Legal Service of Techint E&C is responsible for:

- Providing legal assistance to ensure that the investigation is performed in accordance with the applicable law;
- Providing the advice required to ensure that the evidence collected may be used or submitted to Justice;
- Helping the Human Resources Department to impose the most appropriate and valid disciplinary sanctions.

3.3 Report of Violations

If an employee considers that he/she is being, or was, discriminated or harassed in violation of the Company's Policy, or has witnessed an act of harassment or discrimination, he/she is urged to report the incident immediately to his/her Chief, the Human Resources Department, the Internal Audit Department or the Compliance Line (<https://www.bkms-system.com/TechintEC>).

Techint E&C has implemented a Compliance Line that allows employees, clients, suppliers and other stakeholders to report, anonymously, any conduct against the Code of Conduct or its principles, including this Policy. The Compliance Line operates according to the procedures designed by the Internal Audit Department.

The procedures established in Sections 3.2 and 3.3 must be complied with in all cases except when local regulations may require otherwise, which shall be confirmed by the Legal Service of Techint E&C.

3.4 Investigations and Guarantees

All Reports on Harassment and Discrimination shall be taken into account in a serious manner and treated with due respect. All reports shall be investigated immediately, thoroughly and with impartiality. All persons involved in the review and investigation of any potential violation of this Policy shall take all reasonable measures to preserve the confidentiality of the incident and of the people involved to the extent that it is feasible to carry out a fair, complete and receptive investigation.

If the investigation confirms that there was an incident of Harassment or Discrimination, the most appropriate corrective measures will be taken immediately to duly punish such conduct, stop the Harassment or Discrimination and prevent its concurrence. The corrective action may consist in a disciplinary measure against the harasser or discriminator up to, and including, the dismissal for cause in agreement with the applicable laws.

If the person involved in a behavior that violated this Policy is not an employee of Techint E&C S.A. but a contractor, subcontractor, commercial intermediary, supplier, consultant, partner or any other person providing services for or on behalf of Techint E&C, then Techint E&C shall take, or shall make that third party take, any reasonable and appropriate action, according to the circumstances, to duly punish and stop such conduct involving Harassment or Discrimination as well as prevent its concurrence.

Taking into account the circumstances of each case and while the investigation is being performed, Techint E&C may adopt temporary measures to protect the victim.

3.5 No Retaliation

Techint E&C prohibits all forms of retaliation against any person by another person for:

- Rejecting or refusing the Harassment or Discrimination;
- Reporting the act of Harassment or Discrimination, or
- Participating in or cooperating with the investigation of a case of Harassment or Discrimination.

Retaliation is a serious violation of this Policy and shall be reported in the same way as a complaint for Discrimination or Harassment.

Change Log	
Revision	Comments
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