



POLICY FOR THE PREVENTION OF WORKPLACE HARASSMENT, SEXUAL HARASSMENT, VIOLENCE, AND DISCRIMINATION

A HIGH-LEVEL INSTITUTIONAL COMMITMENT

OD-ADM-002

INSTITUTIONAL DECLARATION

ODINSA and its associated companies promote effective respect for the human dignity of individuals and therefore reject all forms of workplace harassment, sexual harassment, violence, discrimination, and retaliation in the world of work. Each company commits to fostering respectful relationships, acting with due diligence, providing accessible channels, offering timely protection, investigating impartially, guaranteeing due process, and adopting corrective and non-recurrence measures in support of this commitment.

Tolerance, concealment, normalization, or retaliation in the face of such conduct is incompatible with our corporate values and with the right of all people to work in dignified, safe, and violence-free conditions.

OBJECTIVE

To establish the commitment, principles, and corporate rules that guide the prevention, response, protection, investigation, correction, and follow-up of situations of workplace harassment, sexual harassment, violence, and discrimination in the world of work, through differentiated routes articulated with human management, the OHS Management System (SG-SST), contract management, the disciplinary regime, and personal data protection.

SCOPE

This Policy applies to workers, executives, apprentices, interns, contractors and subcontractors, temporary agency workers, applicants, and former employees when the events are related to work during their employment relationship with ODINSA, as well as to suppliers, clients, users, visitors, and other third parties who interact in the work context of ODINSA S.A., ODINSA GESTOR PROFESIONAL S.A.S., ODINSA VÍAS S.A.S., and ODINSA AEROPUERTOS S.A.S., within the legal and contractual competencies of each company.

It covers all workplaces, projects, trips, travel, events, wellbeing and/or training activities, and dining areas, as well as all types of channels and communication spaces provided by

the company for work, in any of its modalities: on-site, hybrid, telework, remote work, and/or work from home.

PRINCIPLES

1. **Human dignity:** All actions will protect the inherent worth of individuals and their consideration as such, avoiding humiliating or degrading treatment.
2. **Equality and non-discrimination:** Equitable treatment will be guaranteed, and any barrier that exists or may arise associated with sex, gender, sexual orientation, identity, age, disability, origin, race, ethnicity, religion, or socioeconomic status will be removed.
3. **Zero tolerance and prevention:** The organization will not normalize harassment or violence and will manage risk factors to prevent such conduct, taking any appropriate measures during and after any complaint of harassment.
4. **Due diligence and promptness:** Reports will be handled with the utmost seriousness, timeliness, and effectiveness, documenting each case.
5. **Confidentiality and data protection:** Information collected in the framework of this Policy will be processed on a need-to-know basis, with restricted access, a specific purpose, and appropriate security measures to guarantee data subjects' rights and legal compliance.
6. **Impartiality and due process:** Actions will be free of undue interest and will guarantee sufficient information, the right to a defense, the right of rebuttal, and the presumption of innocence.
7. **Good faith:** The honesty of those involved will be presumed. The dismissal of a case or insufficient evidence does not amount to bad faith.
8. **Non-revictimization:** The honesty of those involved will be presumed. The dismissal of a case or insufficient evidence does not amount to bad faith.
9. **Differential approach:** In processing the complaints received, power relationships, stereotypes, barriers, and differentiated effects in each case will be taken into account, without replacing the analysis of evidence and the investigative duty of the relevant body.

10. **Non-retaliation:** Any adverse action against anyone who reports, accompanies, investigates, or requests protection for a presumed victim of workplace or sexual harassment in the work environment is prohibited.
11. **Proportionality:** Preventive and/or corrective measures will be reasonable, suitable, necessary, timely, and reviewable; they will not anticipate liability nor run counter to the presumption of innocence and the right to a defense.
12. **Independence of routes:** The internal route does not replace the administrative, judicial, criminal, disciplinary, labor, and/or health actions that may be applicable in each case.

ESSENTIAL CORPORATE RULES

- Workplace harassment is managed in accordance with Law 1010 of 2006, Resolution 3461 of 2025, the company's Internal Work Regulations, and other provisions in force on the matter. The Workplace Coexistence Committee is preventive, advisory, conciliatory, and a channeling body; it does not investigate for sanctioning purposes nor legally declare the existence of workplace harassment.
- Sexual harassment in the work environment may take the form of one or several conducts, in vertical, diagonal, or horizontal relationships, without requiring subordination or a contract between the persons involved. It does not fall within the competence of the analysis and intervention of the Workplace Coexistence Committee and will not be subject to conciliation, mediation, mandatory confrontation, or joint meetings between the presumed victim and the presumed harasser.
- Reports of workplace or sexual harassment in work environments may be filed verbally, in writing, or by digital means. No person is required to correctly identify the applicable legal category in order to be heard and/or to have their complaint processed.
- The filing of an internal complaint may not be conditioned upon a criminal complaint, nor may it limit access to external routes.

- Protection measures will be adopted on a case-by-case basis and will not constitute a sanction or an anticipation of liability. Preference will be given to intervening at the source of the risk rather than shifting the burden onto the protected person.
- The organization will simultaneously and equitably guarantee the rights of the person who reports and of the person under investigation.
- Disciplinary or contractual decisions will be made by the competent authority, through the applicable procedure and based on sufficient evidence; there will be no automatic sanctions.
- Cases involving third parties will be managed through coordination, access restrictions, contractual requirements, and protection measures, without sharing excessive information.

GENERAL RESPONSIBILITIES

Actor	High-level responsibility
Senior Management	Approve the system, allocate resources, preserve independence, review indicators, and remove barriers or retaliation.
Human Management	Administer channels, coordinate protection, articulate labor decisions, training, follow-up, and reporting. Ensure legality, due process, appropriate information handling, and external routes when complaints involve people outside Odinsa's staff, as well as generate any applicable regulatory updates.
OHS Management System (SG-SST)	Integrate prevention and response with psychosocial risk, the annual plan, epidemiological surveillance, and support from the occupational risk insurer (ARL).

Actor	High-level responsibility
Workplace Coexistence Committee (CCL)	Manage the preventive route for workplace harassment within its competencies, terms, and internal protocols.
Corporate Response and Investigation Body (ICAI)	Handle and investigate the specialized cases assigned, including cases of sexual harassment in work environments, with independence, confidentiality, and a differential approach.
Leaders and contract administrators	Listen to and protect the complainant; immediately escalate to the relevant body (CCL or ICAI) any cases of which they become aware; preserve information; and refrain from investigating on their own in the case of complaints of workplace or sexual harassment in work environments.
All persons	Act in accordance with ODINSA's organizational principles and values; maintain respectful treatment with all stakeholders; refrain from committing acts of harassment in any context; cooperate in good faith with investigations in which they are called as a party or witness; keep careful confidentiality of any case of which they become aware and only refer to it before authorized bodies; and refrain from engaging in retaliation.

The responsibilities described above will be carried out so as to avoid the materialization of conflicts of interest, in accordance with the conditions described in numeral 7 of the Protocol that develops this Policy.

PREVENTION AND TRAINING

ODINSA will implement an annual training and prevention plan, differentiated for all populations, leaders, the Workplace Coexistence Committee, ICAI, investigators, and decision-makers. It will include topics such as concepts, warning signs, channels, consent, respectful leadership, protection, evidence, differential approach, due process, personal data, and practical simulations. The training will be evaluated and documented.

CHANNELS, PROTECTION, AND EXTERNAL ROUTES

The official reporting channel will be the Transparency Line — lineatransparencia@odinsa.com. Reports received by leaders, areas, or third parties must be forwarded immediately to the competent channel. The organization will inform the presumed victim of harassment, without pressure, of the external routes available: the labor jurisdiction, the constitutional protection action (acción de tutela), the Ministry of Labor, the Office of the Attorney General (Fiscalía General de la Nación), as well as the health authorities and other authorities competent to handle their complaint.

INFORMATION, REPORTING, AND IMPROVEMENT

The files of the complaints received, and their corresponding processing will be managed in authorized repositories, kept separate from the employment record, the Committee's files, and clinical information. Anonymized data on processed sexual harassment complaints and sanctions imposed will be published on a semi-annual basis, and the report to SIVIGE (the Integrated Information System on Gender-Based Violence) will be prepared within the legal term once the technical component and official instructions are enabled. Indicators will be used to improve the system and not to discourage reporting.

INTEGRATION AND VALIDITY

Each company will complement this Policy with its Internal Work Regulations, disciplinary procedure, contracts, onboarding documents, OHS Management System, legal matrix, third-party management, and data protection framework. It will enter into force upon its approval by each company.

PRINCIPAL REGULATORY FRAMEWORK

Political Constitution; Laws 1010 of 2006, 1257 of 2008, 1581 of 2012, 2209 of 2022, 2365 of 2024, 2466 and 2528 of 2025; the Substantive Labor Code; the Criminal Code, exclusively for the external route; Decrees 1072 and 1074 of 2015, 405 of 2025, and 720 of 2026; Resolutions 2646 of 2008, 0312 of 2019, 2764 of 2022, and 3461 of 2025 (which repealed Resolutions 652 and 1356 of 2012).

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September 1, 2026