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|  | NO ALCOHOL, DRUGS AND NON-DRUGS POLICY SMOKERS | CODE | GE-PLT-002 |
| | | VERSION | 01 |
| | | DATE | 04/15/2024 |

We are a company dedicated to the manufacturing, repair and maintenance of equipment in the metalworking sector. Aware that the consumption of Alcohol, Tobacco, Drugs and Psychoactive Substances has effects on health, which significantly affect work environments, increasing occupational risk, becoming a potential threat to the physical and mental integrity of workers, contractors, suppliers, of goods and services and visitors.

As a result of the above, the criteria and tasks that must be met by the company's workers, contractors and suppliers of goods and services are determined in accordance with the provisions of current legal regulations, as follows:

- Smoking is prohibited within the company's facilities, as well as in the different places in the national territory where the work of providing the service is commissioned.
- Smoking is prohibited inside the vehicles that are part of the logistics itself and contracted for the exercise of the operation.
- All workers, regardless of their contractual model, are prohibited from appearing to perform their activities, obligations, functions or tasks under the influence of alcoholic beverages, psychoactive substances or others that directly affect the performance of the tasks to be performed.
- Workers, contractors and suppliers of goods and services or visitors who are under the influence of alcoholic beverages or psychoactive substances are prohibited from entering the company or customer facilities.
- The consumption and marketing of psychoactive substances and alcoholic beverages is prohibited, both in the company's facilities, in the different fields where the work of providing the service is commissioned, and in the activities that it programs, promotes or leads by itself. outside of these.
- Awareness-raising and training activities are promoted for workers, contractors, suppliers of goods and services, clients and visitors, in which the creation of healthy habits and lifestyles is sought.

With the above **PHANTERA SAS** aims to promote healthy habits and lifestyles.

This policy is strictly followed by workers, contractors, suppliers of goods and services, clients and visitors of **PHANTERA SAS**



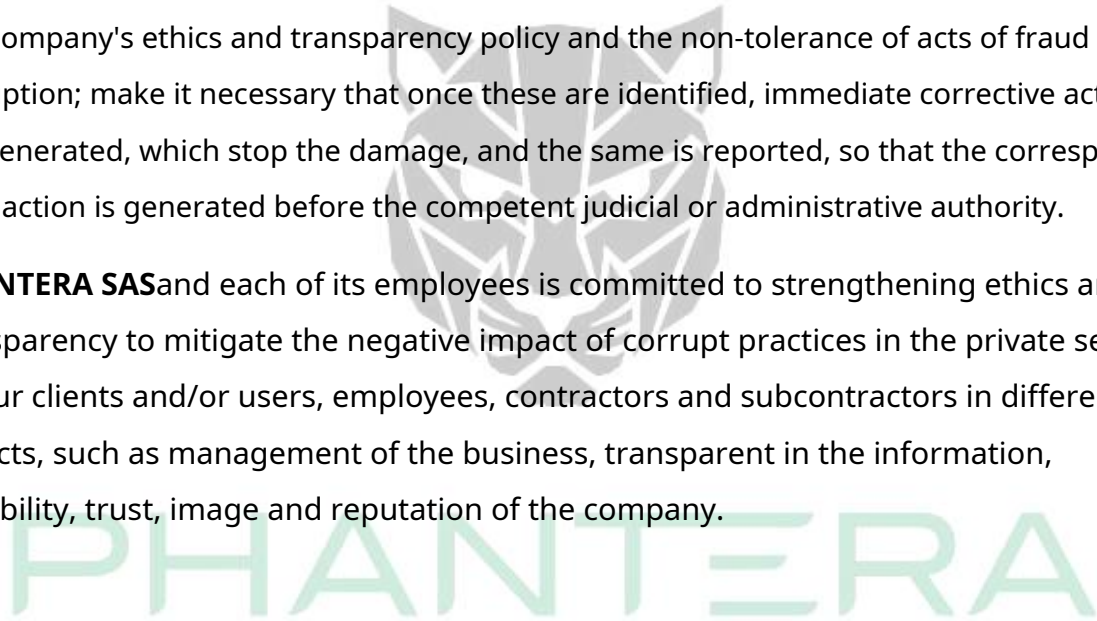
ANA MARIA LOZANO SANTAMARIA
GENERAL MANAGER
PHANTERA SAS


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|  PHANTERA | ETHICS AND TRANSPARENCY POLICY | CODE | GE-PLT-004 |
| | | VERSION | 01 |
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PHANTERA SAS It is committed to the maximum preservation of integrity, where honesty is one of the values of our organization, striving every day to preserve and reflect an unblemished reputation on the part of our employees, for each of the clients and/or users. For this reason we promote and support high standards of ethical conduct, rejecting the promotion and prevention of harmful acts, corruption and fraud; as rules of conduct for all employees.

The company's ethics and transparency policy and the non-tolerance of acts of fraud and corruption; make it necessary that once these are identified, immediate corrective actions are generated, which stop the damage, and the same is reported, so that the corresponding legal action is generated before the competent judicial or administrative authority.

PHANTERA SAS and each of its employees is committed to strengthening ethics and transparency to mitigate the negative impact of corrupt practices in the private sector, on our clients and/or users, employees, contractors and subcontractors in different aspects, such as management of the business, transparent in the information, credibility, trust, image and reputation of the company.



BUILD, INSP  CONTROL
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MARIA LOZANO SANTAMARIA
GENERAL MANAGER
PHANTERA SAS

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|  PHANTERA | HARASSMENT PREVENTION POLICY LABOR | CODE | GE-PLT-005 |
| | | VERSION | 01 |
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PHANTERA SAS Establishes its firm commitment to generating a healthy, safe and adequate work environment for all workers, therefore, prohibits situations of workplace harassment that are framed in threatening, intimidating, abusive or harassing verbal or physical behaviors that may cause the victim any type of physical or psychological damage, counting on the participation of the workers from their responsibilities.

For this reason, the following points are established:

- All workers and other interested parties have the right to work in an environment free of all forms of discrimination and conduct that may be considered harassment, coercion or disruption.
- The company is committed to preventing and minimizing workplace harassment and defending the right of all workers to be treated with dignity at work.
- Carry out awareness-raising and/or training activities on assertive communication, teamwork, conflict resolution, workplace harassment and its consequences, aimed at all levels, in order to reject possible situations of harassment, and support dignity and integrity of people at work.
- The company is committed to establishing activities aimed at generating a collective consciousness of healthy coexistence, which promotes work in dignified and fair conditions; harmony between those who share business work life and a good environment in the company and that protects the privacy, honor, mental health and freedom of workers.
- The company undertakes to provide the necessary human, physical, technological and economic resources for the application of this policy.
- Any person involved in workplace harassment behavior will be subject to investigation in accordance with the provisions of current regulations, procedures and their respective disciplinary measures.

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For the above **PHANTERA SAS** aware of the importance of providing harmonious work environments, aimed at maintaining and improving the work environment, creates the Workplace Coexistence Committee, which has the power to prevent and correct workplace harassment within the framework of work relationships that interfere with the well-being, efficiency and productivity of the Company's workers in general.



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PHANTERA SAS**



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|  PHANTERA | WORK DISCONNECTION POLICY | CODE | GE-PLT-006 |
| | | VERSION | 01 |
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I. OBJECTIVES

Develop within **PHANTERA SAS** the parameters contained in Law 2191 of 2022 on “labor disconnection” and define the conditions of application within the legal powers of the employer.

This policy has transversal importance in the work well-being of employees and is closely linked to the objectives in the matter. Without a doubt, this policy will contribute to improving the actions that have been implemented within the company regarding rest and disconnection from work.

II. SCOPE

This document applies to all collaborators of **PHANTERA SAS**, except for the exceptions described in its development. Nor does it apply to positions or positions of direction, trust and management agreed upon with the celebration or modification of each employment contract and to personnel who have responsibilities related to the provision of missionary service in the field and where the company must guarantee operational continuity.

III. DEFINITIONS AND REFERENCE ASPECTS

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Working day: In Colombia, the working or ordinary day, as it is known, is the one agreed between the parties or, failing that, the legal maximum, which is currently 48 hours per week and with the modification of Law 2101 of 2021 as of July 15, 2023, it will progressively decrease until reaching 42 hours from July 15, 2026.

People excepted from the maximum legal working day: As far as companies are concerned

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and the missionality of **PHANTERA SAS**, the law establishes as employees excluded from the maximum legal working day, those who hold managerial positions or those agreed upon in their employment contract, trust and management, as well as those stated in the scope section.

Rest: Within the framework of the employment contract, rest corresponds to the spaces in which the legislator understands that the employee cannot be interrupted in the personal, family, or other similar context by the employer, as long as he or she is not providing the contracted service and is outside of working hours. A sample of what was noted is the time allocated to enjoying vacations, unpaid leaves, medical disabilities and/or permits.

Work disconnection: In the terms of Law 2191 of January 6, 2022, it was defined as [...] the right that all workers have [...], to not have contact, by any means or tool, whether technological or No, for issues related to your scope or work activity, at times outside the ordinary or maximum legal working day, or agreed upon, nor during your vacations or breaks. [...]

Principle of relativity for work disconnection: This notion includes recognizing the existence of rights and the employer's obligation to respect them. Rest as an expression of labor rights does not imply fullness in its exercise; on the contrary, any right, including fundamental ones, entails relativity. Regarding the latter, the Constitutional Court in Sentence C-475 of 1997 indicated:

[...] Fundamental rights, however, their constitutional consecration and their importance, are not absolute and, therefore, must necessarily be harmonized with each other and with the other goods and values protected by the Charter, since, otherwise,

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absent this indispensable relativization, social coexistence and institutional life would not be possible [...]

Exceptions to the guarantee of work disconnection:As a result of the above, the aforementioned law defines the following workers or events as exempt:

[...] a.- Workers and public servants who hold positions of direction, trust and management;

b. Those who, due to the nature of the activity or function they perform, must have permanent availability, including public forces and relief agencies;

c. Situations of force majeure or unforeseen events, in which it is required to fulfill extra duties of collaboration with the company or institution, when they are necessary for the continuity of the service or to solve difficult or urgent situations in the operation of the company or institution, provided that the lack of another viable alternative is justified.

Workplace Harassment:In development of Law 1010 of 2016, moobing or workplace harassment corresponds to any persistent and demonstrable conduct exercised on an employee, worker by an employer, a boss or immediate or intermediate hierarchical superior, a colleague of work or a subordinate, aimed at instilling fear, intimidation, terror and anguish, causing work harm, generating demotivation at work, or inducing resignation from work. [...] and that proving its existence or not requires:

[...] continuous harassment, which originates among the members of the organization

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of work, where the various social dysfunctions are also reflected and whose premeditated objective is intimidation and intimidation, to consume emotionally and intellectually, hence for the behaviors to materialize they must be concatenated, persistent and fundamentally systematic. [...] Supreme Court of Justice - Sentence SL17063-2017

On the contrary, it is not workplace harassment regardless of the modality defined by law and with regard to work disconnection, applying to the case of **PHANTERA S.AS.:** e) The request to fulfill extra collaboration duties with the company or institution, when necessary for the continuity of the service or to solve difficult situations in the operation of the company or institution; h) The requirement to comply with the obligations or duties referred to in the articles 55 to 57 of the CST, as well as not incurring the prohibitions referred to in the articles 59 and 60 of the same Code., and i) The demands to comply with the stipulations contained in the regulations and clauses of employment contracts (Art. 8 Law 1010 of 2006).

IV. REFERENCE DOCUMENTS

1. Ministry of Labor -Circular 041 of June 2, 2020
2. Law 2191 of January 6, 2022

V. MOTIVATIONS

Rest is a fundamental right with legal regulation and development in various rulings of the High Courts, for example, in ruling C-019 of 2004 it was defined as [...] the opportunity given to the employee to repair his forces intellectual and material,

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to protect their physical and mental health, to share larger and better spaces for fraternal encounter with their family, to undertake activities suitable for spiritual solace, to delve more into reading and knowledge, and, as an aesthetic possibility, to gradually get closer when doing art in its multiple manifestations. [...]

The SARS-CoV2 pandemic since the first quarter of 2020 modified the usual and historical way of executing the employment contract and of course, the daily routine of the workers, however, one of the most profound changes in the daily life of the employment was the acceleration of the digital transformation, the use of ICT instruments in work communication, the modification of the place or workplace (from in-person to home office, teleworking, work at home, remote work or under a hybrid system), digital hyperconnectivity, the extension of the working day, the intrusion of work into the personal sphere of the worker and eventually into that of his family, the increase in stress, the increase in workload due to lack of planning and the lack of a process of transition in the face of these new realities, led to the presentation of bill number 071 of 2020 before the Congress of the Republic, which detailed the following events and needs to become Law of the Republic:

- The increase in working hours in times of pandemic.
- The changes in the world of work generated by digital devices.
- The current panorama on work availability and disconnection.
- The benefits of rest on the productivity of workers and the employer.
- The possible health problems generated by workers due to the lack of disconnection in the workplace.
- The increase in figures due to work stress in the country.
- International examples on work disconnection policies.
- Normative regulation against digital disconnection in the world.

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The above, added to other legal reasons, led to the issuance of Law 2191 of January 6, 2022, which originates the issuance of this document.

On the other hand, the objective of Law 2191 of 2022 is [...] to create, regulate and promote the labor disconnection of workers in labor relations within the different modalities [...] in order to guarantee the enjoyment effective free time and rest periods, licenses and/or permits to reconcile personal, family and work life. [...]

In that sense, **PHANTERA SAS** is aware of the opportunity to improve the new regulations and the enrichment of practices prior to this policy, including due to the historical context of work in our country, within which we highlight the following:

- The social achievements since the Treaty of Versailles in favor of employees against the regulation of the maximum working day.
- The legislative transition and judicial protection of the right to rest.
- The implementation and efforts of the company with the issuance of Circular 041 of June 2, 2020 of the Ministry of Labor.
- The guidelines on respect for the working day given by Senior Management and other employer representatives involved.
- Internal guidelines for personnel administration by the Legal Affairs area.

As a result of the above, **PHANTERA SAS** Acting in turn as an employer, aware of the events and actions of corporate social responsibility, it is convinced that the prescriptions contained herein will continue to have a favorable impact on the enjoyment of free time during times of breaks, permits, and licenses.

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paid benefits, disabilities and/or vacations of workers to improve their personal sphere and where both parties of the employment relationship will have reciprocal benefits, such as:

- Reconcile the employee's personal, family and social life with the work environment.
- Promote and execute organizational plans in work activities and functions.
- Emotional well-being.
- Reduce the stress and psychosocial risk that work may cause.
- Improvement in individual, group and corporate productivity.
- Excellence in the service provided by the company to users, citizens and stakeholders who belong to the social health security system.

Taking into account the above and without prejudice to the efforts made by **PHANTERA SAS** to observe the work day, with this document and to guarantee the right to disconnect from work, undertakes to continue generating and promoting good practices that protect the right to rest, for these reasons, employees may refrain from having contact or communication by any means, including technological means [ICTs, cell phones, internal digital platforms, etc.] to discuss issues or aspects related to the contracted work, functions or activities for which the collaborator is responsible outside of the ordinary working day or business hours. job. What is noted extends when the employee enjoys vacations, breaks, disabilities and unpaid leaves.

Bosses and/or managers will refrain from sending emails or displaying any other type of contact and/or requesting a response to tasks or activities assigned outside of working hours to collaborators. In the event that there is no need to immediately attend to any company requirement and that it is not within the exceptions of this document, the employee will not have the obligation to read and/or respond immediately.

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the message, regardless of the medium or tool used, in that case, you must attend to it the next day within your work day.

Employees will be authorized to disconnect from the network once work hours end, including weekends, vacations, medical incapacity and unpaid leave.

When there are i) events of corporate significance, ii) situations that materialize or expose a risk and/or affect the operation and especially the one that is continued, iii) requirements for urgent attention in favor of the client or potential client, iv) situations of force majeure or fortuitous event, v) extra duties of collaboration that guarantee the provision of the service, vi) needs to solve pressing and/or urgent situations in the operation and vii) resolve specific events by the operational staff that deserve special attention. , shift scheduling and unforeseen events that arise in the operation, the collaborator may be consulted to overcome any of them. In the development of the exceptions described, there should be no other solution mechanism to resolve the situation presented; consultation or request to the collaborator will be the last option.

If, as a result of the above, the activity carried out by the collaborator gives rise to the provision of the service per working hour, the additional work that remunerates the work performed will be cancelled, after accreditation of: i) order from the immediate boss, in which case he or she must state in a simple but clear manner, the importance and/or necessity (by the boss or immediate report), ii) demonstrate the task performed and iii) the reasonable and real determination of the time used, which must be credited by hour(s). complete(s) of work, with prior approval from your boss. The duty to collaborate in any of the exceptions stated when they do not involve the collaborator withdrawing from his or her personal, family or social activities, will in no case imply the payment of additional work.

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In addition to what has been said, the senior management of **PHANTERA SAS** will lead and be an example manager regarding respect for the right to disconnect from work, will promote the importance of training in this matter, including the organization and/or individual or collective planning of assigned functions or tasks, suggesting rules to live harmoniously in the context work, determine rules of conduct and eventually carry out workload analysis to carry out a business measurement on the missionality and the ability to respond to the needs of clients, users or stakeholders by the company's employees. In that order, it is essential to point out that the company will join forces to promote actions on the proper use of emails and awareness in this matter.

On the other hand, as Law 2191 of 2022 determined that failure to observe the guarantee of work disconnection could constitute workplace harassment, the Senior Management considers that there is no sufficient reason to create an additional mechanism to the one that is implemented. The above is important, since creating another procedure could cause confusion or divergences in the prevention and correction mechanisms for workplace harassment. The internal documents in force or that may be implemented will continue to be applied, without in any case ignoring the autonomy of the labor coexistence committee.

In a complementary and preliminary manner to transferring the situation presented to the Labor Coexistence Committee due to the lack of knowledge of this policy, but without invading the competence of the committee, the collaborator may formulate a preliminary request to correct and/or clarify the situation of the person he considers was the recipient. . Will be responsible for presenting the evidence and justifications of the case to the Human Talent Coordination with support from Legal Affairs, who will act as a mediator in the solution of the event, for these purposes the employees involved will show their best and most serious commitment to clarify the case.

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situation presented, including commitments to avoid conduct within the company that could be classified or assessed as workplace harassment in the first place. In this instance, the intention of the alleged person responsible for violating this policy will always be reviewed.

SAW. Exceptions

As stated in previous points, this policy does not apply to positions or roles of direction, trust and management within **PHANTERA SAS** and other statements in the scope section.



VII. Validity

This document will be valid from April 15, 2024.

PHANTERA

Ana Maria Lozano Santamaria

BUILD, INSPECTION AND QUALITY CONTROL

ANA MARIA LOZANO SANTAMARIA

GENERAL MANAGER

PHANTERA SAS

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|  PHANTERA | COMPREHENSIVE POLICY | CODE: | GE-PLT-001 |
| | | VERSION: | 01 |
| | | DATE: | 04/15/2024 |

We are a company dedicated to the manufacture, repair and maintenance of equipment in the metalworking sector at a national and international level as an organization, we assume the commitment to provide the necessary resources, both human and material, to comply with the Comprehensive Policy (Safety, Health in the work, Environmental and Quality), to this end, senior management has defined the following commitments:

- Identify hazards, evaluate and assess risks and establish the necessary controls to prevent accidents, occupational diseases and/or property damage.
- Generate a culture aimed at promoting quality of work life, well-being and self-care, providing safe working conditions and healthy lifestyles to prevent injuries and deterioration of health, promoting and managing spaces for employees with their families.
- Comply with the requirements of the law and other requirements established by the organization in safety, occupational health, environment and quality.
- Adopt communication, participation and consultation measures for workers and interested parties.
- Maintain and continually improve with high quality standards in each of the organization's activities, and in our HSEQ management, through the satisfaction of interested parties.
- Provide the human, physical, financial and technological resources necessary for the design, implementation and monitoring of the integrated management system (IMS).
- Minimize the socio-environmental impact, through the prevention of pollution, reduction in the consumption of natural resources and their sustainability.
- Promote social responsibility activities, allowing us to understand the needs and expectations of interested parties.
- In addition to adopting measures to prevent, correct and punish workplace harassment, discrimination, respect for Human Rights, child abuse, Indigenous Communities and maintain the culture of transparency and values, within the framework of protected work relationships. by law.

Being thus committed to providing a quality service, with good working conditions in the development of the activity to prevent accidents and illnesses at work, guaranteeing the safety of our workforce, as well as that of our suppliers, contractors, subcontractors and other interested parties.



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