



1. INTRODUCTION

Purpose of this policy is to instruct employees on moral and sexual harassment in the workplace, means of prevention, reporting channels and measures in the event of occurrence or suspicion of occurrence.

2. CONCEPTS

2.1. WHAT IS BULLYING/MORAL HARASSMENT?

It is the repeated exposure of an employee to abusive conduct, whether intentional or not, which undermines its integrity, identity and dignity, through humiliating and embarrassing situations in the workplace, with the action occurring repeatedly and over a long period of time.

3. CLASSIFICATION

Interpersonal bullying: occurs on an individual basis, with the aim of eliminating or harming a specific employee.

Institutional bullying: occurs when the institution itself encourages the practice of inhumane and humiliating acts or tolerates cases of harassment.

4. MAIN ATTITUDES THAT CHARACTERIZE BULLYING

- ✓ Ignoring the presence of the harassed employee in front of other employees;
- ✓ Ridiculing, inferiorizing the employee, either in front of others employees or in private;
- ✓ Requesting humiliating tasks or purposely leaving the employee without tasks;
- ✓ Shouting or speaking disrespectfully;
- ✓ Spreading offensive rumors about the employee;
- ✓ Attributing derogatory nicknames;
- ✓ Imposing vexatious punishments;
- ✓ Posting derogatory messages in company groups;
- ✓ Delegating tasks or deadlines that are impossible to meet;
- ✓ Manipulating information by accusing the victim of acts that it did not commit;
- ✓ Excessive surveillance.



It's worth remembering that this is a list of examples, and there are several other occurrences that are included in the attitudes that constitute bullying.

5. WHAT IS NOT BULLYING?

- ✓ Professional demands;
- ✓ Demands to meet demands and deadlines;
- ✓ Increased workload;
- ✓ Use of technological control mechanisms;
- ✓ Healthy conflict of ideas, opinions and interests;
- ✓ Professional stress caused by workload peaks;
- ✓ Job changes or transfers, as long as it are not punitive or constitute persecution;
- ✓ Criticism or assessments of the work carried out, as long as it are well-founded and communicated in a constructive and respectful manner.

**Bullying can only be defined as repeated acts and not
isolated occurrences!**

6. WHAT IS SEXUAL HARASSMENT?

It is the practice of conduct with a sexual connotation, in order to disturb, embarrass or intimidate the victim.

It can be verbal, non-verbal or physical.

7. CLASSIFICATION

Blackmail: when the acceptance or rejection of a sexual advance is decisive for the harasser to make a favorable or detrimental decision regarding the harassed person.

Intimidation: covers all conduct that results in a hostile, intimidating or humiliating environment.

8. CRIMINAL CLASSIFICATION



Article 216-A of the Penal Code considers sexual harassment to be a crime, with the offender being imprisoned for one to two years.

Gender of the victim is not a determining factor in the characterization of the crime, i.e. the practice can affect both men and women.

9. MAIN ATTITUDES THAT CHARACTERIZE SEXUAL HARASSMENT

- ✓ Making jokes of a sexual nature, as well as offensive, intimidating or uncomfortable jokes;
- ✓ Making obscene proposals or invitations;
- ✓ Practicing sexist jokes;
- ✓ Groping, humping or touching the other person in a malicious way;
- ✓ Making gestures or sounds of a sexual nature;
- ✓ Forcing a kiss;
- ✓ Sharing or showing sexually suggestive images.

10. WHAT IS NOT SEXUAL HARASSMENT?

- ✓ Attempting a romantic relationship in a respectful manner and accepting the "no" limit;
- ✓ Mere gallantry with normal comments such as "I like your dress", therefore without embarrassment and not sexually related.

Harassment is defined as the embarrassment caused by sexual conduct that is incompatible with the work environment or by insisting on an invitation that you have no interest in!!!

(mainly by using superior hierarchical status and usually with the threat of dismissal or retaliation for refusing the invitation).

11. CONSEQUENCES OF MORAL OR SEXUAL HARASSMENT FOR THE INSTITUTION

- Reduced productivity;
- Increase in errors and accidents;
- Increased absenteeism and sick leave;
- Change in the quality of service provision;



- Increased turnover;
- Labor lawsuits.

12. EMPLOYEES' DUTIES AND OBLIGATIONS

It is up to everyone to maintain a good relationship between colleagues, subordinates and managers, striving for mutual respect and not allowing rude discussions, jokes not in keeping with the work environment and conflicts during the working day.

Any kind of discriminatory expression of any kind (race, color, age, gender, sexual orientation, religion, physical or mental disability, ethnic precepts, socio-cultural condition, nationality or marital status) directed at any person is expressly forbidden.

No type of moral or sexual harassment is allowed, nor is any type of harassment that defiles the dignity of any person or creates an intimidating, hostile or offensive working environment.

13. WHAT CAN EMPLOYEES DO IN THE EVENT OF EVIDENCE OF HARASSMENT?

REPORT IT, because only then can the company take the appropriate measures.

To this end, the whistleblower can choose to report anonymously, if it sees fit, but it is essential to provide as many details as possible about the incident, as well as evidence, if any.

It is worth remembering that all information will be confidential and will preserve the image and privacy of the harassed person.

If not anonymous, the whistleblower will be informed of the progress of the complaint, including when the investigations are concluded.



14. INTERNAL CHANNELS

DLC has set up an internal communication channel, which can be accessed at www.dlcdiesel.com.br/etica.

IDENTITY OF THE WHISTLEBLOWER WILL BE KEPT CONFIDENTIAL.

15. DUTIES AND OBLIGATIONS OF THE COMPANY

DLC is responsible for monitoring the routines of the departments, using the existing complaints channel and investigating the facts and adopting the appropriate measures to remedy the facts that have occurred, if found to be true.

16. HOW SHOULD THE COMPANY POSITION ITSELF IN RELATION TO THE COMPLAINT?

After becoming aware of a complaint, whether through the specific channel or any other way, an internal investigation must be launched in order to check the veracity of the allegations reported in the complaint.

This will take place confidentially, and will in no way expose the harassed person or even the harasser, since the aim is to curb the practice.

Complaints are investigated and dealt with by a committee made up of the CEO, a representative of the Legal Department and the People & Management Coordination.

Person responsible for the investigation will be the People & Management Coordination in conjunction with other areas, if necessary (within the scope of the investigation), in order to be able to ascertain the occurrences, but always without mentioning names or positions.

If there is evidence of moral or sexual harassment, an illegal act or an act contrary to internal rules, the G&G Coordination must report it to the committee, which may, by joint decision, adopt one or more of the options below:

1. Instruct the harasser about its conduct and, if it is something that can be corrected (isolated event, minor occurrence, absence of intent), accompany it in an attempt to correct its behavior;
2. Apply the appropriate disciplinary measures, such as a verbal or written warning, suspension or dismissal for just cause, if appropriate;



3. In the event of an extremely serious incident, the harasser's employment contract will be terminated immediately, and a police report may even be drawn up by the victim if there is evidence of a crime linked to the harassment.

DLC RELIES ON EVERYONE'S COLLABORATION TO ENSURE THAT WE HAVE A HEALTHY WORKING ENVIRONMENT, AND IF YOU ARE SUFFERING ANY FORM OF MORAL OR SEXUAL HARASSMENT, IT IS IMPORTANT THAT YOU REPORT IT THROUGH THE WHISTLEBLOWING CHANNEL SO THAT IT CAN TAKE THE APPROPRIATE MEASURES TO STOP THIS PRACTICE!

17. OPEN COMMUNICATION

We emphasize that DLC encourages an "Open Door" policy, keeping all confidential channels available for suggestions and complaints.

Anyone who identifies a violation of the Code of Ethics and Conduct and its other policies should report it via www.dlcdiesel.com.br/etica . All cases will remain confidential and anonymity will be protected. No retaliation against the whistleblower will be tolerated!

Content of the report must be as complete as possible (indicating the day, place, time, people involved and detailed facts) in order to ensure a thorough investigation.

Luiz Antônio Caporali

CEO



ACKNOWLEDGEMENT

I registered with the Individual Taxpayer under no. am aware that I have received, read and agree with the terms of this policy delivered and explained by the DLC Group.

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(employee's signature)