	Environmental, Social and Health and Safety Management System (ESHSMS) Policies	Code: POL/VABG
		Version: 00
INTERNAL USE		Date: 18/08/25
		Page 1 of 4

GENDER-BASED VIOLENCE AND HARASSMENT PREVENTION POLICY (POL/GBVH)

Prepared by:	Reviewed by:	Approved by:
Area: Environmental & Social (E&S) Name: Viviana Brun Position: Environmental & Social Coordinator Signature:  Date: 18/08/25	Area: Technical Management Name: Juan Pablo Nogués Position: Project Manager Signature: Date: 18/08/25	Area: Presidency Name: James Spalding Position: President Signature: Date: 18/08/25

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 INTERNAL USE	Environmental, Social and Health and Safety Management System (ESHSMS) Policies	Code: POL/VABG
		Version: 00
		Date: 18/08/25
		Page 2 of 4

VERSION HISTORY

Version N°	00			
Date (dd/mm/yyyy)	18/08/25			
Changes	Document creation.			
Prepared by	Area: E&S	Name: Viviana Brun	Position: E&S Coordinator	Signature: 
Reviewed by	Area: Technical Management	Name: Juan Pablo Nogués	Position: Project Manager	Signature:
Approved by	Area: Presidency	Name: James Spalding	Position: President	Signature:

	Environmental, Social and Health and Safety Management System (ESHSMS) Policies	Code: POL/VABG
		Version: 00
INTERNAL USE		Date: 18/08/25
		Page 3 of 4

Gender-Based Violence and Harassment Prevention Policy (POL/GVBH)

Guiding Principles (PRs)

- Compliance with the provisions of the National Constitution of Paraguay, Law No. 5777/16 on the Comprehensive Protection of Women Against All Forms of Violence, the Labor Code (Law No. 213/93), and other applicable regulations, as well as the international standards adopted by the Project, especially IFC Performance Standard (PS) 2, which sets clear obligations to prevent harassment, gender-based violence, and other forms of abusive treatment, requiring the implementation of mechanisms for prevention, response, and redress within the workplace and in interactions with contractors and suppliers, and PS 4 of the IFC, which establishes the duty to prevent risks to community health and safety, including those derived from inappropriate, abusive, or violent interactions by Project personnel.
- Zero tolerance for any form of Gender-Based Violence and Harassment (GBVH), including sexual harassment, workplace harassment, abuse of power, coercion, or any behavior that undermines a person's dignity on the basis of gender.
- Respect, equality, and fair treatment, without discrimination based on gender, gender identity, sexual orientation, or other condition.
- Confidentiality and non-retaliation for individuals who report or participate in investigations related to GBVH.
- Preventive assessment and monitoring of contractors, subcontractors, and suppliers to ensure compliance with this policy.

To comply with these principles, ATOME will manage the following in its activities:

- Promote a safe and respectful environment for all individuals, both inside and outside the workplace.
- Develop awareness and training campaigns on GBVH for direct personnel, contractors, and subcontractors.
- Include specific GBVH prevention clauses in third-party contracts.
- Establish safe, accessible, confidential, and gender-sensitive reporting channels through the Project's Grievance Mechanism.
- Ensure a timely and fair response to any GBVH complaint, respecting confidentiality and the dignity of those involved.
- Coordinate with relevant authorities or specialized services in cases where legal, medical, or psychological assistance is required.
- Appoint a focal point within the local ESHS team to oversee the implementation of this policy and its coordination with ESHS MS tools.

 INTERNAL USE	Environmental, Social and Health and Safety Management System (ESHSMS) Policies	Code: POL/VABG
		Version: 00
		Date: 18/08/25
		Page 4 of 4

As President of ATOME Paraguay S.A.E., I am committed to ensuring that the Company has an organizational structure and the necessary resources for the effective implementation of this Policy.

This Policy will be communicated to and accessible by all personnel, at all hierarchical levels, including direct employees, contractors, or those representing the Company in any other way. Its implementation will be the responsibility of all, and compliance will be required of employees, contractors, subcontractors, and suppliers.

The GBVH Prevention Policy will be reviewed annually to ensure its validity, effectiveness, and suitability to the Project context.

This Policy aligns with the principles established in the Corporate Policies on Sustainability, Ethics & Compliance, and Corporate Social Responsibility of ATOME PLC (United Kingdom), adapting their guidelines to the local context and ensuring their implementation through the ESHS MS.

Signature:

Name: James Spalding

Position: President

Date: 18/08/25