

Diversity, Equality and Inclusion Policy

BRUC

2023

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1. INTRODUCTION AND OBJECTIVES

This document details BRUC's Diversity, Equality and Inclusion Policy, hereinafter DEI Policy. It presents how the organization conducts its business and sets out BRUC's vision and commitments to equity, equality, inclusion and diversity.

The Policy aims to establish BRUC's commitments and principles to guarantee equal opportunities, non-discrimination, diversity and inclusion of our professionals.

Objectives of BRUC DEI Policy:

- Promote equal opportunities, diversity, and non-discrimination among employees and stakeholders.
- Ensure inclusive processes for selection, hiring, and professional development that enhance equal opportunities.
- Ensure respectful environments that exclude all forms of discrimination and harassment.
- Maximize a positive and respectful workplace environment by enhancing awareness and consciousness.

BRUC's DEI Policy considers other corporate policies, such as the Sustainability Policy and the Code of Conduct. Therefore, it aligns with international frameworks and references such as the Agenda 2030, the principles of the United Nations Global Compact or the guidelines of the Organization for Economic Co-operation and Development (OECD).

2. SCOPE AND GOVERNANCE

Sustainability commitments are integrated horizontally within BRUC. This Diversity, Equity, and Inclusion (DEI) Policy establishes the fundamental principles and commitments for the proper management of personnel and business across its value chain, addressing key aspects related to DEI.

All employees and governing bodies must incorporate the principles of equality, diversity, inclusion, and non-discrimination in key business decisions and in their day-to-day actions. In addition to promoting that relations with stakeholders respect these principles and commitments.

Policy and Related Matters - Approvals

The Board of Directors of BRUC is responsible for approving (i) the DEI Policy and any amendment or update of it, as the case may be, and (ii) any associated business plans and budget allocations. The Board will discuss material DEI issues regularly and review the Policy and/or approve plans or budgets at least annually.

Policy and Related Matters - Execution, Monitoring and Reporting

Management is responsible for overseeing the communication, monitoring, reporting on and evaluating the DEI Policy. Every employee of the Company is responsible for knowing and complying with this policy's principles in his/her day-to-day operations, hence every employee must receive information or training on the Policy and plans as needed.

3. COMMITMENTS

BRUC is committed to establishing a workplace based on values such as respect, unity, diversity and inclusion. We are aware that fostering diversity and inclusion improves decision-making, team synergy and creativity, and also strengthens our ability to attract and retain the best talent.

The organization is committed to:

Inclusive working environment

Promote an inclusive culture and environment where all employees feel welcomed, valued and supported. Establish an environment of respect and tolerance by eliminating any type of discrimination among employees and stakeholders: racial and ethnic origin, color, sex, sexual orientation, gender identity, disability, age, religion, political opinion, national or social origin, or any other discriminatory grounds established by law.

To promote respectful and inclusive language, both among employees and in business relationships, as well as in internal and external communication. Discourage any form of discriminatory or offensive language in all internal communications, including emails, meetings, and official documents.

Equality in working conditions

Ensure benefits and work options that allow employees to reconcile their personal and family life without discrimination and unequal treatment.

Equal opportunities in recruitment

Facilitate transparent recruitment practices by ensuring a recruitment process based on inclusive criteria to enable equal opportunities and prevent discrimination for any discriminatory reason.

Promote employees' professionalism and awareness to uphold the principles of diversity and inclusion in the selection process, being mindful and understanding any social prejudices that may be present and may arise in our environment.

Carrer development

Promote professional development and promotion practices that guarantee equal opportunities among employees. In addition to the positioning of under-represented groups in positions of high responsibility and decision-making within the organization.

Awareness

Maintain and promote ongoing employee awareness of diversity and inclusion issues through communications and by conducting specific diversity and inclusion training so that employees understand the importance of embracing different perspectives.

Zero tolerance towards harassment

Ensure an environment free from any form of harassment of professionals or any third party in the line of work (whether in the office, outside the office or online) including physical, verbal or written harassment, psychological abuse or mistreatment, bullying or discrimination as well as acts or threats of violence. Harassment includes offensive jokes, comments, pictures and insults or other intrusions into personal space or privacy.

Guaranteeing processes and mechanisms to prevent, mitigate and address any possible incidence of discrimination or harassment detected.

Trade and business relations

Emphasize the importance of using respectful and inclusive language in interactions with clients, partners, and other stakeholders.

Promote the commitments outlined in the DEI Policy in its procurement process. Bruc strives to ensure and guarantee equality, diversity, and inclusion in its interactions with suppliers and customers during commercial relations and uphold a professional and courteous tone in written and verbal communication to maintain positive business relationships.

4. ETHICS CHANNEL

In the event that there are reasonable indications of a violation of the provisions of the Policy or that any act contrary to the law or business ethics that may affect BRUC has occurred, such suspicion must be reported to BRUC through the established channels.

To this end, the Group has established the Ethics Channel, an internal information system through which BRUC Professionals, directors, suppliers or any third party must report possible criminal or administrative infractions or any illicit or unethical conduct or conduct contrary to ethics, this Code or applicable legislation committed in the context of the Group's activity.

The Ethics Channel can be accessed through the following route:
<https://brucenergy.integrityline.com/frontpage>.

Communications made through the Ethics Channel will be processed in accordance with the provisions of BRUC's Ethics Channel Policy and with the guarantees recognized therein. BRUC admits anonymous communications.

Communications will be treated with strict confidentiality, and there will be no retaliation of any kind against the informant for making a report, unless the report was made in bad faith. In such cases, BRUC may take appropriate measures.

5. COMMUNICATION

BRUC will make this DEI Policy available on its website to ensure knowledge and encourage compliance with the principles and commitments established in this document.

In addition, it undertakes to communicate related programs and actions to stakeholders as required.

This Policy has been approved by BRUC's Board of Directors on 31th January 2024.